

EXHIBIT 1-E

Ex. E to Plaintiff's Motion to Extend filed 8-19-20

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

GOBIND SINGH, M.D., PH.D.,)	
)	Civil Action No. 3:17-cv-00400
Plaintiff,)	
)	The Honorable Eli Richardson
v.)	
)	Magistrate Judge Barbara D. Holmes
VANDERBILT UNIVERSITY MEDICAL)	
CENTER, and VANDERBILT)	
UNIVERSITY,)	
)	
Defendants.)	

PLAINTIFF’S SUPPLEMENTAL ANSWERS TO CERTAIN INTERROGATORIES

Plaintiff, GOBIND SINGH, by counsel, Edward R. Moor of Moor Law Office, P.C., states in supplemental answer to the interrogatories propounded by Defendants VANDERBILT UNIVERSITY MEDICAL CENTER and VANDERBILT UNIVERSITY, as follows:

1. Identify each and every individual whom you believe to possess knowledge of any discoverable facts relating to the subject matter of this litigation. For each such individual, provide his or her address and telephone number and describe what knowledge you believe such individual possesses.

ANSWER: See prior answers. In addition, Dr. Natalie E. Cusano, MD, Associate Professor of Medicine, Donald and Barbara Zucker School of Medicine at Hofstra Northwell, 110 E. 59th Street, 8th Floor, Suite 8B, New York, New York 10022. Dr. Cusano is Plaintiff’s current treating endocrinologist who will testify that Plaintiff has central hypothyroidism secondary to a pituitary adenoma and that the condition is well control with the appropriate hormone supplements.

4. Identify every physician, counselor, therapist or other healthcare professional from whom you have sought treatment within the last ten (10) years, specifically including those who have treated you for the conditions that you contend give rise to your asserted disability. For each such healthcare provider, please state the date(s) treatment was rendered, the reason for treatment, and the healthcare provider’s area of practice. If any such treatment was allegedly related to the claims in the Complaint, that fact should be specified.

ANSWER: See prior answers. Dr. Natalie E. Cusano, MD, Associate Professor of Medicine, Donald and Barbara Zucker School of Medicine at Hofstra Northwell, 110 E. 59th Street, 8th Floor, Suite 8B, New York, New York 10022. Dr. Cusano is Plaintiff's current treating endocrinologist who will testify that Plaintiff has central hypothyroidism secondary to a pituitary adenoma and that the condition is well control with the appropriate hormone supplements.

10. Set forth in detail every category of damages you are claiming in this lawsuit, the amount sought for each category of damages, the basis for your claim that you are entitled to each such amount, and the methodology or formula you used to calculate your entitlement to each such amount.

ANSWER: See prior answers. In addition, future lost income as a fellowship trained Ophthalmologist (i.e, retina specialist/surgeon) as discussed as Dr. Sternberg's deposition, and see answer to interrogatory 11.

11. Identify by name, address, and telephone number each person who you expect to call as an expert witness at trial, state the subject matter on which the expert is expected to testify, state the substance of the facts and opinions to which the expert is expected to testify, and a summary of the grounds for each opinion, and identify every document provided to and/or received from such expert, including any correspondence exchanged by and between your attorney(s) and such expert.

ANSWER: Dr. Howard Baum, VUMC-Endocrinology, is expected to testify consistent with his previously produced correspondence and with his medical records, attached, which are believed to have been in the possession of the Defendant. Dr. Baum is a treating physician and has not been retained in this matter. In general, it is expected that he will testify that he diagnosed Plaintiff with primary hypothyroidism in March 2015, and that he will testify about his subsequent care and treatment of Plaintiff, and the diagnoses he reached at various times.

Dr. Scott J. Stephan, VUMC-ENT, is expected to testify consistent with his previously produced correspondence and with his medical records, attached, which are believed to have been in the possession of the Defendant. Dr. Stephan is a treating physician and has not been retained in this matter.

Dr. Natalie E. Cusano, MD, Associate Professor of Medicine, Donald and Barbara Zucker School of Medicine at Hofstra Northwell, 110 E. 59th Street, 8th Floor, Suite 8B, New York, New York 10022. Dr. Cusano is Plaintiff's current treating endocrinologist. Based upon her treatment of Plaintiff she is expected to testify that he has central hypothyroidism, which is well controlled with the appropriate regimen of hormone supplements. Based

upon her care and treatment of Plaintiff, and her knowledge of his medical history as learned in treatment, she is expected to testify that the Plaintiff's central hypothyroidism first became symptomatic in late 2014. In addition, Dr. Cusano is expected to testify that Plaintiff's hypothyroidism was capable of being accommodated in 2015, but was not, and is expected to testify that Plaintiff's hypothyroidism was incorrectly worked up and incorrectly diagnosed as primary hypothyroidism in 2015. These, and other opinions, are contained in the attached report attached as **Exhibit A**.

Dr. Thaddeus Wandel, New York Medical College, Department of Ophthalmology, Macy Pavilion, Room 1044A, Valhalla, New York, 10595. Dr. Thaddeus Wandel, Ophthalmologist and former Program Director of the New York Medical College (NYMC/WMC) Residency Program in Ophthalmology, previously disclosed as a fact witness, will testify about his interactions with Plaintiff, Plaintiff's initial acceptance into the NYMC/WMC Residency Program, the effect of the Summative Evaluation received from VUMC, and his subsequent investigation into the claims made by VUMC which resulted in Dr. Wandel, and others at NYMC urging that Plaintiff be accepted into the program, as stated in his August 17, 2016 letter, previously produced and reattached here as **Exhibit B**. The previously produced August 17, 2016 letter clearly opined that Dr. Wandel, and others at NYMC, clearly expected Dr. Singh to succeed as an ophthalmologist. However, out of an abundance of caution, and without conceding in any way that Dr. Wandel is, in fact, the type of witness who needs to furnish a report under F.R.Civ.P. 26(a)(2)(B), Plaintiff has obtained and is producing a letter report from Dr. Wandel, attached, and Dr. Wandel is expected to testify consistent with the opinions expressed therein, see **Exhibit C**.

Charles L. Baum II, Ph.D., 2930 Cherry Blossom Lane, Murfreesboro, Tennessee 37129. Dr. Baum is expected to testify consistent with the attached report. See **Exhibit D**.

Dr. Paul Sternberg, VUMC, is expected to testify consistent with his deposition as to the earnings of fellow-ship trained ophthalmologists.

Dr. Gobind Singh, M.D. P.h.D (Plaintiff and physician), is expected to testify consistent with his deposition. In addition, he will opine, based on his experience and training, that had he been allowed to either finish the VUMC ophthalmology residency or been allowed to enroll in the NYMC ophthalmology residency, that he would have completed the residency and sat and passed any required ophthalmology boards to become a retina specialist/surgeon. He will also opine that his central hypothyroidism was not properly assessed in 2014-2016, it was misdiagnosed and incorrectly worked up by Dr. Baum (and consequently treated for primary hypothyroidism and not central hypothyroidism and associated conditions),

and that even so he could have performed his residency at VUMC had any of his requests for accommodation been considered and granted.


MOOR LAW OFFICE, P.C.

By: /s/ Edward Roy Moor

MOOR LAW OFFICE, P.C.
One North LaSalle Street, Suite 600
Chicago, Illinois 60602
(312) 726-6207
erm@moorlaw.net

VERIFICATION

Under penalties as provided by law, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.



GOBIND SINGH

7/31/20

Certificate of Service

I certify that I served this document by emailing a copy to each person to whom it is directed below on July 31, 2020.

/s/ Edward R. Moor

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

Luther Wright, Jr., TN #17626

Casey M. Parker, TN #033081

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Natalie E. Cusano, MD, MS
Director, Bone Metabolism Program
Lenox Hill Hospital
Department of Medicine
Associate Professor of Medicine
Donald and Barbara Zucker School of Medicine at Hofstra Northwell
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July 31, 2020

Dr. Singh transitioned his endocrine care to me in April 2020. He has been diagnosed with central hypothyroidism secondary to a pituitary adenoma, and I am currently treating him for that condition. I have reviewed over 300 pages of his previous medical records including records from Vanderbilt, Columbia University Medical Center, and material from Dr. Susan Henley and Dr. Baum. Please see my attached curriculum vitae for my qualifications and prior publications. I have not testified in any other cases as an expert at trial or by deposition. I plan to donate any compensation provided to me to the Hormone Health Network to increase patient awareness and engagement in their medical condition(s). I charge \$350 an hour for records review, and \$450 an hour for deposition and trial testimony.

Dr. Singh was diagnosed with primary hypothyroidism in March 2015 while he was a resident at Vanderbilt and started on levothyroxine 50 mcg daily. Dr. Singh continued to have symptoms that included decreased energy, decreased concentration, and cold intolerance even after starting levothyroxine. I understand that these symptoms persisted including in July 2015. In my opinion, both Dr. Singh and another endocrinologist, Dr. Susan Henley, both requested reasonable accommodations formally with the EAD, which included limitation of work hours to 12 hour shifts with a recovery period of 12 hours. Dr. Henley's request for accommodations for Dr. Singh's accommodations were denied, resulting in an inability to complete his residency training and thus ending his medical career. I did not see any response to Dr. Singh's request for accommodations that accompanied Dr. Henley's request.

The thyroid is a critical gland located in the neck responsible for the production of T4 and T3 thyroid hormones, which are responsible for various aspects of metabolism. Human life is not sustainable without it properly functioning, which is why careful monitoring of thyroid function in patients with any thyroid disease is done before surgery, pregnancy, etc. The thyroid and many other hormone producing organs in the body are controlled by the pituitary gland in the brain. Hypothyroidism (low thyroid function) is a general diagnosis that can occur due to the thyroid itself not working correctly (primary hypothyroidism), the more common form, or to the pituitary gland not making enough thyroid stimulating hormone (TSH) to stimulate the thyroid to make enough hormone (central hypothyroidism). Signs and symptoms of hypothyroidism from any cause affect multiple organ symptoms and can include fatigue, depression, decreased concentration, slow speech, weakness, weight gain, bradycardia (slow heart rate), constipation, and dry skin.

While endocrinologists historically were taught that central hypothyroidism classically presents with low TSH and low T4/T3 levels, this is no longer the case as TSH has been found to often be normal and may even be mildly elevated in around 8% of patients (similar to Dr. Singh) due to secretion of TSH that is not biologically active. For these reasons, TSH must be measured with free T4 (Ft4) when evaluating any patient with concern for hypothyroidism. The pituitary gland is also responsible for the production of other hormones that play a vital role in normal biological functions, including cortisol, estradiol/testosterone, and growth hormone. This is important because for central hypothyroidism, other hormones are often affected too, along with elevated prolactin at times when the cause is due to cancer/mass lesions.

In March 2015, Dr. Singh was diagnosed with primary hypothyroidism on the basis of an elevated TSH value of 5.346 mIU/mL (normal: 0.350-3.600). Unfortunately, no free T4 was measured along with TSH before levothyroxine was started (total T4 and free T3 levels were within range). A free T4 value, which was not obtained at the time of diagnosis, would have likely assisted in the correct diagnosis of central hypothyroidism or at least prompted further investigation, as a low FT4 level would have been indicative of central hypothyroidism.

In the setting of a diagnosis of central hypothyroidism, other pituitary hormones must be evaluated. In fact, Dr. Singh was subsequently found to have deficiencies in testosterone and growth hormone along with mildly elevated prolactin, which was attributed due to a pituitary microadenoma (brain tumor) by MRI imaging.

Even without a clear consideration for central hypothyroidism, other endocrine causes of Dr. Singh's symptoms should have been considered given his persistent symptoms in 2015 and afterwards. Testosterone deficiency can result in fatigue, decrease in muscle bulk, decreased libido, sexual dysfunction, and depression mood. Growth hormone deficiency can result in decreased lean muscle mass, decreased quality of life, and possibly increased cardiovascular risk. Dr. Singh is now being replaced for these hormone deficiencies.

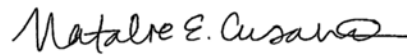
Also, even if a diagnosis of central hypothyroidism were not considered, Dr. Singh had persistent symptoms that may have still been attributable to primary hypothyroidism (despite labs in the normal range), and an increase in his levothyroxine dose strength should have been considered.

T3 is the active form of thyroid hormone with biologic effects on multiple organs. The thyroid makes more T4 than T3 hormone, since T4 is converted by many tissues to T3. Only free thyroid hormone is thought to be biologically active (and not bound to protein). The typical treatment for patients with all forms of hypothyroidism is levothyroxine (T4). However, approximately 5%-10% of hypothyroid patients on levothyroxine replacement therapy have persistent symptoms, despite normal thyroid hormone levels. These patients may not be able to convert T4 to T3 as efficiently as other individuals, resulting in decreased levels of active thyroid hormone at the organs that need it. In these patients, combination T4 and T3 therapy may be beneficial. In fact, Dr. Singh felt significant improvement when he switched to another form of thyroid hormone replacement that includes both T4 and T3 (along with an increase in dose strength).

In my opinion, Dr. Singh had central hypothyroidism secondary to a pituitary adenoma in 2015, and he still has it. For his endocrine disorders, Dr. Singh is currently treated with a regimen of

Armour Thyroid (combination T4 and T3), cabergoline (a medication to decrease prolactin from a pituitary tumor and thus increase testosterone), and Norditropin (daily growth hormone injection). He was previously also treated with testosterone replacement. We continue to work closely together to titrate his regimen.

Sincerely,

A handwritten signature in black ink, reading "Natalie E. Cusano". The signature is fluid and cursive, with the first name "Natalie" being more prominent and the last name "Cusano" following in a similar style.

Natalie E. Cusano, MD, MS

EXHIBIT A



NEW YORK MEDICAL COLLEGE


DEPARTMENT OF OPHTHALMOLOGY
WESTCHESTER MEDICAL CENTER AFFILIATION
MACY PAVILION - ROOM 1044
VALHALLA, NEW YORK 10595 TEL 914-493-7671 FAX 914-493-7445

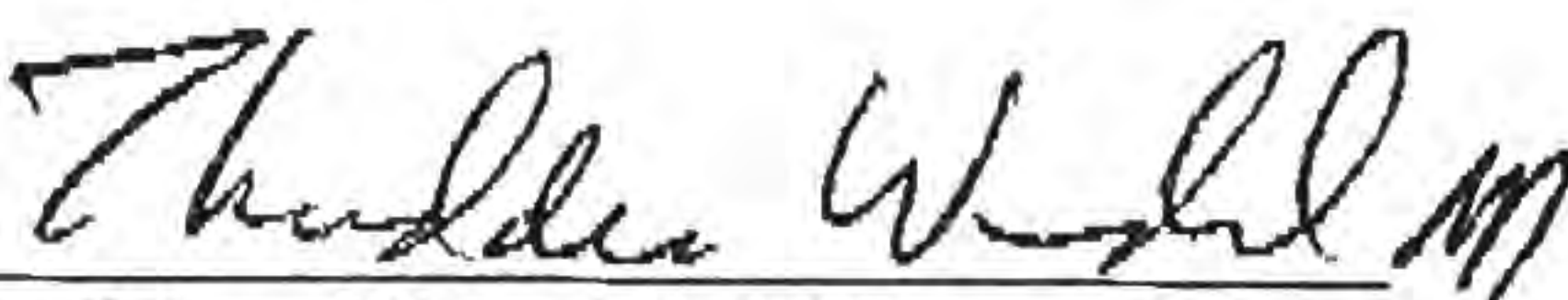
THADDEUS WANDEL, M.D.
PROGRAM DIRECTOR

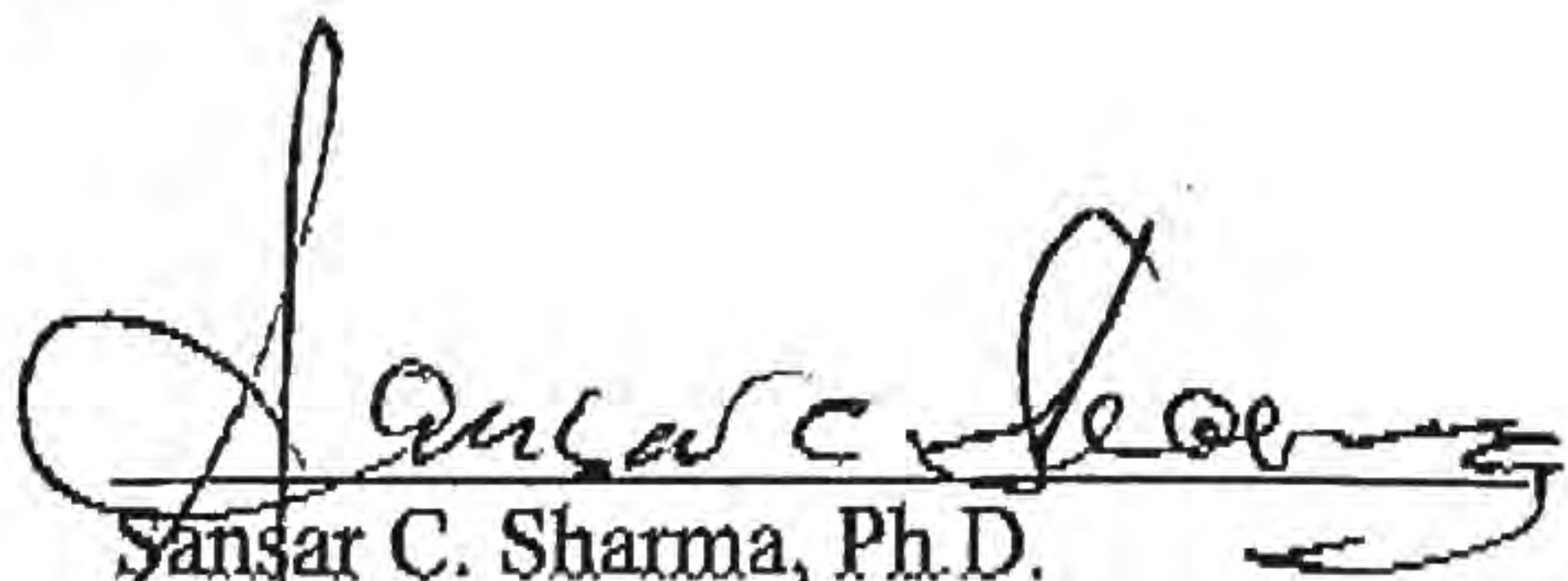
August 17, 2016

Dear Dr. Bierman

The Summative Evaluation from Vanderbilt University regarding Dr. Gobind Singh's performance as a Resident lists disciplinary actions taken and his ultimate dismissal in a fashion that offers no explanations for his poor performance. After many hours of discussion with Dr. Singh, an, credible, documented, alternative cause of his poor performance became clear. We present this alternate scenario in the enclosed document. We hope that Dr. Singh's application for a Residency in Ophthalmology will be accepted based on a new review of the evidence presented. We continue to stand by Dr. Singh and consider him capable of combining skills as a clinical Ophthalmologist with research at the highest level.


Gerald Zaidman, M.D.


Thaddeus Wandel, M.D.
Program Director


Sansar C. Sharma, Ph.D.

Professor

Department of Ophthalmology

EXHIBIT B



NEW YORK MEDICAL COLLEGE

A MEMBER OF THE Touro College and University System

WWW.NYMC.EDU

DEPARTMENT OF OPHTHALMOLOGY
MACY PAVILION, ROOM 1044A VALHALLA, NEW YORK 10595 TEL 914-493-1243 FAX 914-493-3450

THADDEUS WANDEL, M.D.
RESIDENCY PROGRAM DIRECTOR

Edward R. Moor Esq

28 July ,2020

Moor Law Office , PC

One North LaSalle Street, Suite 600

Chicago , Illinois 60602

Dear Mr. Moor:

The following report provides information you requested on the opinions that I will express at trial regarding my interactions with Dr. Gobind Singh.

1 – I was the Program Director (PD) for Ophthalmology Residency Program at New York Medical College (NYMC) in 2016 at the time when Dr. Gobind Singh applied for an opening in the second year of Ophthalmology training (PGY-3) that was available at our program, as posted online on by San Francisco (SF) Match. I reviewed Dr. Singh's application and was impressed by his credentials. In my capacity as PD, I invited Dr. Singh for an interview to meet me and other senior faculty members. At his interview, it was clear Dr. Singh would be an asset to

our program. Dr. Singh had made us aware that he was diagnosed with a thyroid disease while he was a resident at Vanderbilt and it had impacted his performance resulting in his dismissal, he was feeling better on optimized medical treatments and eager to resume his Ophthalmology training. After input from the senior staff in the Department of Ophthalmology, and my evaluation of his available credentials, I offered Dr. Singh a residency position at our program in April 2016. In accordance with ACGME policies, I had requested from Vanderbilt that Dr. Singh's verification of training, the Summative Evaluation, be sent to NYMC but was informed this could not be sent until Dr. Singh had signed a waiver of consent. This document is required before a resident can transfer their training to another institution. Dr. Singh's acceptance was put on hold pending receipt of that document and review of its contents.

After Dr. Singh signed a waiver, Vanderbilt's Dr. Donald Brady (not an Ophthalmologist) sent us Dr. Singh's Summative Evaluation.

This document described Dr. Singh as a substandard resident (overall Level 1) according to ACGME milestone evaluations dated June 2015, and could only be read as suggesting that Dr. Singh never completed his PGY-2, and was without any extenuating circumstances to explain his negative evaluations. No medical leave or medical diagnoses were mentioned as a mitigating factor. Overall, the weight of the negative evaluations outweighed our favorable impression of his capabilities and NYMC withdrew Dr. Singh's acceptance offer.

Because the Summative Evaluation made no mention of the effect of Dr. Singh's thyroid disease on his performance as a resident, I continued talking to Dr. Singh and after receiving additional documentation I, and two senior members of the Department of Ophthalmology determined that his reported performance at

Vanderbilt was out of character to his documented performance in his medical school training and internship. Because there was a credible documented alternative cause to his reported poor performance, we concluded that his reported poor performance at Vanderbilt was caused by his thyroid disease. I and two other senior members of the Department of Ophthalmology then wrote a letter stating this opinion to the Head of our GME (Graduate Medical Education) Department in support of Dr. Singh's admission but despite our efforts the offer of a resident position in Ophthalmology remained withdrawn because of the negative evaluation of Dr. Singh in the Summative Evaluation.

Based upon my experience as an Ophthalmologist, my experience as a Program Director of NYMC's Ophthalmology Residency Program, on my knowledge of Dr. Singh personally, through his resume which included publications, and based on my review of material provided by Vanderbilt and my review of material submitted by Dr. Singh after NYMC withdrew its offer, it is my opinion that Dr. Singh would have completed the NYMC Ophthalmology Residency Program, would have passed the America Board of Ophthalmology certification exam , and would have gone into practice as either a general Ophthalmologist or a retina surgeon . It is my opinion that the only reason that he was not admitted to NYMC was because of his poor Summative Evaluation, which the Head of GME at NYMC chose to rely upon.

It is also my opinion that because the average salary of an employed Ophthalmologist in the USA in 2019 was \$329,000 per year (Medscape.com), and the average salary of a retina surgeon was \$590,000 per year (Becker Hospital Review .com), Dr. Singh would currently be earning one of these amounts annually depending on

whether he specialized in retina surgery or not after completion of the residency.

2- I base my assessment of Dr. Gobind Singh on over 7 years of experience as the Program Director for Resident Training in Ophthalmology and another 30 years as an attending teaching Glaucoma treatment to Ophthalmology residents and interviewing candidates for Ophthalmology residency positions . My CV is enclosed.

3- In the last 4 years , I have not testified in a trial or participated in a deposition .

4- My fee is \$400 per hour , \$2000 per half day, and \$ 3200 for a day .

Sincerely

A handwritten signature in black ink, appearing to read "Tad Wandel MD". The signature is fluid and cursive, with the letters "Tad" and "Wandel" being more prominent than "MD".

Tad Wandel MD

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

GOBIND SINGH, M.D., PH.D.,

Plaintiff,

v.

VANDERBILT UNIVERSITY
MEDICAL CENTER (VUMC), and
VANDERBILT UNIVERSITY (VU),

Defendants.

Case No.:

EXPERT REPORT BY CHARLES L. BAUM, PH.D.

June 25, 2020

ECONOMIC LOSS APPRAISAL IN THE CASE OF GOBIND SINGH, M.D., PH.D.

1. I am Charles L. Baum II, Ph.D., a professor of economics and finance at Middle Tennessee State University. I have a Ph.D. in economics from the University of North Carolina at Chapel Hill and a B.A. in political science from Wake Forest University. My full curriculum vita is provided as Exhibit A. Neither I nor my opinions represent Middle Tennessee State University, the University of North Carolina at Chapel Hill, or Wake Forest University in this matter. I generate this report on behalf of Baum Economics LLC.
2. In this report, I provide an analysis of the economic losses from lost earnings and lost employment benefits for Gobind Singh (Dr. Singh) due to Dr. Singh's employment termination by Vanderbilt University Medical Center and Vanderbilt University (Vanderbilt) on February 25, 2016 and to information Vanderbilt subsequently provided the New York Medical College/Westchester Medical Center (NYMC/WMC) about Dr. Singh, considering the two events collectively (*i.e.*, not double-counting the losses for each event for purposes of modelling only).
3. I develop no opinions on and draw no conclusions about the allegations against Vanderbilt; I develop no opinions on and draw no conclusions about whether Vanderbilt is liable for any wrongdoing. Instead, I have been asked to calculate the present value of Dr. Singh's economic losses from lost earnings and employment benefits assuming these allegations are true.

4. In return for this report, I am compensated at a rate of \$220 per hour by the plaintiff.
5. It is my understanding Dr. Singh was born January 13, 1982, graduated summa cum laude from Boston University with a Bachelor's degree in chemistry (with a specialization in biochemistry). He subsequently earned both a Ph.D. in 2011 specializing in cancer immunology and an M.D. in 2013 from the Icahn School of Medicine at Mount Sinai Hospital in New York City, New York. It is my understanding he graduated in the top half of his graduating class and successfully matched into a residency program path that began with one year in an Internal Medicine Internship at Highland Hospital (UCSF) followed by three years in Ophthalmology at the Vanderbilt Eye Institute at Vanderbilt.
6. It is my understanding after successfully completing his Internal Medicine residency-internship from 2013 to 2014 as a postgraduate year 1 (or PGY-1), Dr. Singh began post-graduate training at Vanderbilt as a second-year resident (or PGY-2) on July 1, 2014. While at Vanderbilt, it is my understanding that Dr. Singh completed his PGY-2 rotations and was given a contract by Vanderbilt promoting him to PGY-3 (from second year to third year).
7. It is my understanding Dr. Singh's employment as a resident was terminated by Vanderbilt on February 25, 2016.
8. It is my understanding Dr. Singh re-applied and interviewed for other Ophthalmology residency programs and was accepted at NYMC/WMC on April 1st, 2016 as a PGY-3.
9. It is my understanding Dr. Singh relocated to New York afterwards and completed NYMC/WMC pre-orientation requirements ahead of July 1, 2016 start date. However due to information given on or around June 17th, 2016 to NYMC/WMC by Vanderbilt, information that allegedly summarized Dr. Singh's performance as a resident while at Vanderbilt, NYMC/WMC revoked Dr. Singh's on or around June 24, 2016.
10. It is my understanding after NYMC/WMC revoked Dr. Singh's residency employment offer, he again re-applied to ophthalmology residency programs during 2016-2017. Dr. Singh informed me that this time he also applied to internal medicine programs because he feared Vanderbilt's information "was so damaging and false that a career in any field of medicine may no longer be possible" (Dr. Singh). Dr. Singh conveyed to me that he had hoped since he had already completed one year in internal medicine, "this might get him in the door" (Dr. Singh). I understand Dr. Singh did not match into any ophthalmology program nor was he offered any Internal Medicine interviews.
11. It is my understanding Dr. Singh received Tennessee unemployment compensation during portions of 2016, which were terminated in June/July 2016 after presumably NYMC/WMC reported Dr. Singh was to begin employment with them on July 1st.
12. It is my understanding Dr. Singh resumed searching for replacement employment

in good faith and was ultimately recruited as a research associate in 2017 at BMO Capital Markets Corporation (BMO) in New York City, New York after a short-term employment stint at an investor relations firm.

13. It is my understanding Dr. Singh was promoted to senior associate in 2018 at BMO but his salary between 2018 and 2019 actually decreased due to poor market conditions/performance. Dr. Singh is currently employed in that position as of the date of this report.
14. It is my understanding Dr. Singh believes his employment termination by Vanderbilt was discriminatory and retaliatory and in violation of the Americans with Disabilities Act of 1990 and that the information Vanderbilt exchanged with NYMC/WMC about him was defamatory and constituted tortious interference with a business relationship in violation of Tennessee common law.
15. According to documents I have reviewed, Dr. Singh earned from Vanderbilt \$54,966 in 2014, \$52,067.52 in 2015, and \$11,390.48 in 2016, with various insurance benefits, such as health insurance and life insurance, and government-mandated benefits (e.g., employer Social Security retirement contributions on Dr. Singh's behalf).
16. According to documents I have reviewed, Dr. Singh earned from BMO \$159,895.48 in 2017, \$196,112.04 in 2018, and \$188,266.21 in 2019 with various employment benefits, including insurance and retirement benefits and government-mandated benefits.
17. In this analysis, based on the assumption that paragraphs 5-16 are true, I calculate the economic losses to Dr. Singh in the form of lost earnings and lost employment benefits due to his employment termination by Vanderbilt on February 25, 2016 and to information Vanderbilt subsequently provided to NYMC/WMC about Dr. Singh.
18. Throughout this analysis, I do not consider the possibility of reinstatement, whereby Dr. Singh would be allowed to complete his residency training and eventually become a fellowship-trained ophthalmologist. In turn, the economic loss calculations in this analysis do apply to (and should not be used for) a scenario where Dr. Singh is reinstated.
19. The case-related documents used to prepare this analysis are listed in Exhibit B and other references are listed in Exhibit C.
20. Federal and Tennessee courts in employment cases allow recovery for lost earnings as part of the process of making the injured party whole (*Albemarle Paper Co. v. Moody*, 422 U.S. 405, 418, 95 S.Ct. 2362, 2372, 45 L.Ed.2d 280 (1975); *Frye v. Memphis State University*, 806 S.W.2d 170 (Tenn.1991)). Lost pay from the time of the discrimination to the trial (back pay) and after the trial (front pay) are both recoverable (*Shore v. Federal Express Corp.*, 777 F.2d 1155, 1159 (6th Cir.1985); *Coffey v. Fayette Tubular Product*, 929 S.W.2d 326, 332 (Tenn.1996); *Baum*,

2015). Front pay is the difference in what the plaintiff would have earned in the future with reinstatement at the time of trial and what the plaintiff would have earned in the future in the plaintiff's next best employment (*McKnight v. General Motors Corp.*, 908 F.2d 104, 116 (7th Cir.1990)). The availability of front pay supports a policy of not requiring reinstatement where debilitating frictions and animosity between an employer and employee is anticipated such that the court might have to continue to supervise the employment relationship into the future for many years (*McNeil v. Economics Laboratory, Inc.*, 800 F.2d 111, 118 (7th Cir.1986)).

21. Lost employment benefits, such as insurance and retirement benefits, are recoverable in Sixth Circuit and Tennessee employment cases (*Arban v. West Publ'g Corp.*, 345 F.3d 390, 405 (6th Cir.2003); *Jordan v. A.C. Enterprises, Inc.*, 2012 WL 6562032, *4 (Tenn.Ct.App.2012)). However, in some circuits, including the Sixth Circuit, if a terminated worker lost an employer-provided benefit, such as health insurance coverage, but did not replace that benefit after the discrimination and incurred no monetary loss for not having that benefit, then the injured party is not eligible to receive compensation for that benefit (*Gunter v. Bemis Co., Inc.*, 906 F.3d 484, 493 (6th Cir.2018); *Tolan v. Levi Strauss & Co.*, 867 F.2d 467, 470 (8th Cir.1989)).
22. The economic loss is a projection of the difference in Dr. Singh's earnings and employment benefits from Vanderbilt as a resident and from a career as an ophthalmologist and his actual and projected earnings and employment benefits as a senior research associate in finance. This framework is based on the assumption that—absent any wrongdoing by Vanderbilt—Dr. Singh would have been able to complete his ophthalmology residency and become an ophthalmologist but that the actions of Vanderbilt have prevented or blocked Dr. Singh from a career as an ophthalmologist and from a career in any field of medicine (including business-related occupations that may built upon experience with medical training had he completed his ophthalmology residency (*i.e.*, chief medical officer, director of medical affairs).
23. An analysis date of June 15, 2020 is set in order to develop a calculation of the economic losses for backward pay and forward pay
24. The first part of the calculation is the loss from the past, pre-trial period, which is February 25, 2016 (the date of Dr. Singh's employment termination) through June 15, 2020. The second part is the loss from the future, post-trial period, from June 16, 2020 to January 26, 2049, which is Dr. Singh's remaining worklife expectancy (28.61 years) from the time of this analysis (Skoog, Ciecka, and Krueger, 2019). Worklife expectancies are derived from Markov increment-decrement models, which are based on survival probabilities calculated using the U.S. Life Tables and employment transition probabilities calculated with Current Population Survey (CPS) data.
25. In a first scenario, shown in Table 1, I assume Dr. Singh absent his employment

termination would have completed his residency at Vanderbilt by the summer of 2017, at which time he would have begun working as a general ophthalmologist. I assume Dr. Singh's earnings as a resident would have equaled \$52,067.52 (in year-2015 dollars), which are his actual earnings from Vanderbilt in 2015 (the only full calendar year in which he was a resident at Vanderbilt). I assume Dr. Singh's earnings as an ophthalmologist would have equaled the age-specific median earnings for physicians and surgeons in American Community Survey (ACS) data (U.S. Census Bureau, 2020; Expectancy Data (2019)). The ACS is a supplement to the Current Population Survey (CPS) that monthly surveys approximately 250,000 respondents, asking various questions including questions designed to obtain information about personal income. ACS data over the five-year, 2013 through 2017 period is used to generate adequate sample sizes.

26. The average median earnings for Dr. Singh, unadjusted for inflation or wage growth, over the 2018 through 2049 period based on ACS data is \$329,697 (in year-2017 dollars). When including employment benefits, as described below, the average median compensation (i.e., earnings and employment benefits) for Dr. Singh, unadjusted for inflation or wage growth, over the 2018 through 2049 period based on ACS data is \$409,562 (in year-2017 dollars). According to Medical Group Management Association (MGMA) data, median compensation (i.e., earnings and employment benefits) for ophthalmologists was \$374,201 (in year-2014 dollars; \$392,741 when adjusted for wage growth to year-2017 dollars) (MGMA, 2015). According to Medscape's Ophthalmologist Compensation Report, median compensation (i.e., earnings and employment benefits) is \$378,000 (in year-2020 dollars; \$349,313 when adjusted for wage growth to year-2017 dollars) (Medscape, 2020).
27. As stated by Dr. Paul Sternberg in his May 8, 2019 deposition, the starting compensation of a board-certified fellowship-trained ophthalmologist is \$150,000 to \$250,000 per year, with Dr. Sternberg citing as sources the AMGA, AUPO, and MGMA salary surveys. My analysis of median compensation for a fellowship-trained ophthalmologist according to the MGMA survey results for annual compensation is meaningfully higher than \$150,000 to \$250,000 per year. This conclusion is essentially unchanged when using compensation for ophthalmologists and retina specialists provided by the American Medical Group Association (AMGA). This conclusion is also unchanged when using the 2020 Medscape Ophthalmologist Compensation Report.
28. Dr. Singh's earnings are assumed to have grown over time with price inflation and productivity (Becker, 1975; Ben-Porath, 1967; Gilbert, 1997). Wages tend to increase over time with prices to maintain purchasing power, and wages tend to increase over time as workers become more productive with the newest and latest technologies. Workers also become more productive over their careers as they acquire work experience and learn new skills on the job.
29. Based on Occupational Employment Statistics (OES) data, wage growth for healthcare practitioners and technical occupations nationally was 1.45 percent in

2015, 1.29 percent in 2016, 2.13 percent in 2016, 2.57 percent in 2017, and 2.63 percent in 2018 (Bureau of Labor Statistics, 2020).

30. I project future wage inflation after 2018 using a rate of 2.80 percent per year. Over the 20-year period from 1999 through 2019, wage growth was 2.80 percent per year for healthcare practitioners and technical occupations in OES data (Bureau of Labor Statistics, 2020). Otherwise, over the past 10 years, the average annual growth rate in weekly earnings for production and nonsupervisory employees in the private sector in the Current Employment Statistics (CES), in the wages and salaries of all civilian workers in the Employment Cost Index (ECI), and in wages for covered workers reported by the Social Security Administration (SSA) has been 2.20 percent, and over the past 20 years, the average rate of annual wage growth in CES, ECI, and SSA data has been 2.83 percent (Bureau of Labor Statistics, 2019a, 2019b). The Congressional Budget Office forecasts wage growth for civilian workers of 3.1 percent per year in 10 years, and the Social Security Advisory Board predicts long-term wage growth for covered workers of 3.81 percent annually (Congressional Budget Office, 2019; Social Security Trustees Report, 2019).
31. Thus, wages in this analysis change (increase) with age over the career and over time with wage inflation.
32. I assume Dr. Singh would have received employment benefits from his employer. This is projected to equal the proportion of compensation represented by employment benefits for private-sector workers as reported by the Bureau of Labor Statistics (2019c), which is 24.22 percent of wages.
33. From the economic losses, I subtract Dr. Singh's actual and projected earnings from replacement employment as a researcher at BMO. This amount was \$159,895.48 in 2017, \$196,112.04 in 2018, and \$188,266.21 in 2019. Thereafter, I assume Dr. Singh's earnings equal age-specific earnings between the 75th and 90th percentiles for market research analysts and marketing specialists with at least a Master's Degree in business and financial occupations in American Community Survey (ACS) data (U.S. Census Bureau, 2020; Expectancy Data (2019), adjusted to Dr. Singh's 2019 salary of \$188,266.21. As before, I include future wage growth, this time of 2.57 percent, and employment benefits equal to 24.22 percent of wages. Over the 20-year period from 1999 through 2019, wage growth was 2.57 percent per year for business and financial occupations in OES data (Bureau of Labor Statistics, 2020).
34. When awarding damages for front pay, federal and Tennessee courts in employment cases require future losses to be discounted to present value (*Suggs v. ServiceMaster Educ. Food Management*, 72 F.3d 1228, 1234 (6th Cir.1996). See also *Roush v. KFC Nat'l Mgmt. Co.*, 10 F.3d 392, 399 (6th Cir.1993) and *Shore v. Federal Express Corp.*, 777 F.2d 1155, 1160 (6th Cir.1985)). This is to identify the amount paid in the present as a lump-sum that when invested will grow in the future to the amount of the losses.

35. Future dollar values are discounted to present value using a rate of 3.40 percent. Over the past 10 years, the average interest rate on 1-year treasury bills, 10-year treasury notes, and 20-year treasury bonds has been 2.08 percent, and over the past 20 years, the average interest rate on 1-year treasury bills, 10-year treasury notes, and 20-year treasury bonds has been 3.23 percent (Board of Governors of the Federal Reserve System, 2019). The Congressional Budget Office forecasts interest rates on 10-year treasury notes to be 3.2 percent in 10 years, and the Social Security Advisory Board predicts long-term interest rates on a mix of treasury securities to be 5.1 percent (Congressional Budget Office, 2019; Social Security Trustees Report, 2019).
36. I do not use the “Alaska rule” for present-value discounting, where the wage growth rate (or price inflation rate) and the interest rate used for discounting are assumed to be equal and to offset one another, because there is no economic evidence that the rate of wage growth (or price inflation) equals interest rates or that the relationship between the two is even stable over time.
37. Taxes due on lump-sum damages awards may differ from what the tax liability would have been on periodic earnings from the terminating employer. However, courts in the Sixth Circuit have not supported making adjustments for this (*Taylor v. Brennan*, 2015 WL 3466272 at *3 (W.D.Tenn.2015); *Pollard v. E.I. DuPont de Nemours, Inc.*, 338 F.Supp.2d 865, 883 (W.D.Tenn.2003); Baum, 2015). Following that precedent, I do not incorporate tax adjustments in my analysis.
38. It is my understanding that in federal courts, benefits and payments from a collateral source—a source other than the tortfeasor—are normally inadmissible, and economic damages are typically not reduced by payments made from collateral sources (*Jackson v. City of Cookeville*, 31 F.3d 1354, 1359 (6th Cir.1994)). The Sixth Circuit has concluded that collateral benefits should not ordinarily be deducted as offsets (*Hamlin v. Charter Tp. of Flint*, 165 F.3d 426, 432 (6th Cir.1999)). However, if the tortfeasor or an entity acting on the tortfeasor’s behalf makes a payment or provides a benefit, such as severance pay, to the injured party, then economic damages should be reduced by that amount. Benefits that are commonly subject to the collateral source rule include unemployment benefits (*Rasimas v. Michigan Dept. of Mental Health*, 714 F.2d 614, 623 (6th Cir.1983)) and workers’ compensation (*Thurman v. Yellow Freight Sys., Inc.*, 90 F.3d 1160, 1170 (6th Cir.1996)). Following this, I make no adjustments for income or benefits, if any, from third-party sources, such as unemployment compensation, and instead consider these to be collateral sources that would become a windfall to the defendants were they to be deducted from the economic damages.
39. In this first scenario, presented in Table 1, the present value of the economic losses from lost earnings and employment benefits is calculated to be \$2,095,213.

A terminated worker is required to exercise reasonable diligence in seeking replacement employment to mitigate damages (*Rasimas v. Michigan Dept. of Mental Health*, 714 F.2d 614, 624 (6th Cir.1983)) but “[t]he employee is not

required to mitigate damages by accepting a position that is not comparable or is, in effect, a demotion” (*Ford Motor Co. v. E.E.O.C.*, 458 U.S. 219, 231, 102 S.Ct. 3057, 3065, 73 L.Ed.2d 721 (1982)). The plaintiff does not have to move to another location (*Rasimas v. Michigan Dept. of Mental Health*, 714 F.2d 614, 623 (6th Cir.1983)). If the fact-finder determines that mitigation from replacement employment as a research associate should not be included (since this is a different line of work and required a geographic re-location to New York City from Nashville), then the present value of the economic losses from lost earnings and employment benefits is calculated to be \$12,598,908, as shown in Table 2.

40. In a second scenario, shown in Table 3, I re-estimate my first scenario assuming Dr. Singh’s earnings as a general ophthalmologist would have equaled the age-specific earnings for physicians and surgeons at the 75th percentile in American Community Survey (ACS) (U.S. Census Bureau, 2020; Expectancy Data (2019)). The average 75th-percentile earnings for Dr. Singh, unadjusted for inflation or wage growth, over the 2018 through 2049 period based on ACS data is \$418,601 (in year-2017 dollars). When including employment benefits, the average 75th percentile compensation (i.e., earnings and employment benefits) for Dr. Singh, unadjusted for inflation or wage growth, over the 2018 through 2049 period based on ACS data is \$520,001 (in year-2017 dollars). According to Medical Group Management Association (MGMA) data, 75th percentile compensation (i.e., earnings and employment benefits) for ophthalmologists is \$495,338 (in year-2014 dollars; \$519,880 when adjusted for wage growth to year-2017 dollars) (MGMA, 2015). Otherwise, I use the same formulas, growth rates, and replacement earnings as in my first scenario. In this second scenario, the present value of the economic losses from lost earnings and employment benefits is calculated to be \$5,612,660. If the fact-finder determines that mitigation from replacement employment as a research associate should not be included (for reasons discussed above), then the present value of the economic losses from lost earnings and employment benefits is calculated to be \$16,116,356, as shown in Table 4.
41. In a third scenario, shown in Table 5, I re-estimate my first scenario assuming Dr. Singh’s earnings had he been allowed to become a vitreoretinal surgeon (*i.e.*, retina specialist). The age-specific earnings for physicians and surgeons at the 90th percentile in American Community Survey (ACS) (U.S. Census Bureau, 2020; Expectancy Data (2019)). The average 90th percentile earnings for Dr. Singh, unadjusted for inflation or wage growth, over the 2018 through 2049 period based on ACS data is \$487,417 (in year-2017 dollars). When including employment benefits, the average 90th-percentile compensation (i.e., earnings and employment benefits) for Dr. Singh, unadjusted for inflation or wage growth, over the 2018 through 2049 period based on ACS data is \$605,487 (in year-2017 dollars). According to Medical Group Management Association (MGMA) data, median compensation (*i.e.*, earnings and employment benefits) for retina specialists is \$603,539 (in year-2014 dollars; \$633,441 when adjusted for wage growth to year-2017 dollars) (MGMA, 2015). In this scenario, I also incorporated two additional years of fellowship at earning levels comparable to that of a resident (until mid-2019). Otherwise, I use the same formulas, growth rates, and replacement earnings

as in my first scenario. In this third scenario, the present value of the economic losses from lost earnings and employment benefits is calculated to be \$7,352,257. If the fact-finder determines that mitigation from replacement employment as a research associate should not be included, then the present value of the economic losses from lost earnings and employment benefits is calculated to be \$17,855,953, as shown in Table 6.

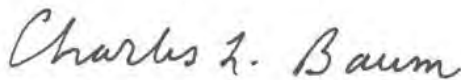
42. It is my understanding that of Dr. Singh's total earnings as a researcher at BMO, a cap amount of \$50,000 for bonus and \$150,000 for base salary is allowed per contractual arrangements. Given the bonus amount awarded is dependent on market conditions and profitability/performance, it is my understanding that Dr. Singh cannot earn bonus amount greater than \$50,000 but he could be subject to no bonus if poor market performance (but still would earn \$150,000 base). As such, it is my understanding from Dr. Singh that he cannot earn more than \$200,000 in his current position. Lastly, it is my understanding Dr. Singh works a minimum of 12 hours per day as a research associate for BMO (16 to 18 hours per day during earnings season), which is approximately twice the number of hours typically worked by ophthalmologists (Medscape, 2020). In turn, I provide three additional scenarios (presented in Tables 7, 8, and 9), where I repeat the first three scenarios with mitigation incorporated (presented in Tables 1, 3, and 5) but where Dr. Singh's future replacement earnings (i) include a \$25,000 bonus and (ii) do not increase over time and where Dr. Singh's past and future replacement earnings (iii) are hours-adjusted such that they reflect earnings for the same quantity of work as the ophthalmologist earnings (i.e., divided by two). With these adjustments combined, I use \$87,500 for Dr. Singh's replacement earnings in these additional scenarios. In turn, the present value of the economic losses using median ophthalmologist earnings is \$10,242,021 (Table 7), using 75th percentile ophthalmologist earnings is \$13,759,469 (Table 8), and using 90th percentile ophthalmologist earnings is \$15,499,066 (Table 9).
43. The present value of the economic losses from the various loss scenarios are summarized in the table below.

	<u>Scenario 1:</u> <u>With</u>	<u>Scenario 2:</u> <u>Without</u>	<u>Scenario 3:</u> <u>With Adjusted</u>
<u>Ophthalmology Earnings</u>	<u>Mitigation</u>	<u>Mitigation</u>	<u>Mitigation</u>
Median Earnings	\$2,095,213	\$12,598,908	\$10,242,021
75th Percentile Earnings	\$5,612,660	\$16,116,356	\$13,759,469
90th Percentile Earnings	\$7,352,257	\$17,855,953	\$15,499,066

44. In addition to the economic losses in the summary table above, it is my understanding Dr. Singh incurred various costs to become a research associate that he would not have had to incur if he had become an ophthalmologist, and he continues to incur various costs to remain qualified for associated obligations and memberships—although there likely would have been various costs to remain

qualified as an ophthalmologist (e.g., continuing education course credits may have been required). Nevertheless, it is my understanding these costs for a researcher in finance include preparation costs to pass Series 7, 63, 86, and 87 financial exams of \$3,000 in total (across the four exams). Having passed these exams, Dr. Singh will likely now begin to incur periodic renewal fees. It is my understanding annual membership fees for various associations and memberships (required in his current work as a research associate) currently range from \$200 to \$630 per association membership for Dr. Singh. Dr. Singh also incurs approximately \$735 per year related to medical license renewal fees.

45. It is my understanding Dr. Singh has incurred significant business losses in the form of start-up expenses that would lower his earnings to being negative, but I do not include these losses in the analysis given I assume Dr. Singh had the option to cease business operations anytime he wanted to.
46. Given the documents and information provided by Dr. Singh and given the applicable economic information available for the analysis, I believe these calculations and this analysis to be reasonable and reflective of the economic circumstances of this case.
47. I reserve the right to revise this report if or when additional information becomes available.



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Table 1: Economic Losses from Lost Earnings and Lost Employment Benefits for Dr. Singh. (See commentary in paragraph 18)

<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	<u>11</u>	<u>12</u>	<u>13</u>	<u>14</u>	<u>15</u>	<u>16</u>	<u>17</u>
<u>Year</u>	<u>Ophthalmology Wage Growth</u>	<u>Unadjusted Ophthalmologist Earnings</u>	<u>Ophthalmology Wage Growth Adjustment Factor</u>	<u>Adjusted Ophthalmologist Earnings</u>	<u>Ophthalmologist Benefits</u>	<u>Replacement Wage Growth</u>	<u>Unadjusted Replacement Earnings</u>	<u>Replacement Wage Growth Adjustment Factor</u>	<u>Adjusted Replacement Earnings</u>	<u>Replacement Benefits</u>	<u>Loss</u>	<u>Discount Period</u>	<u>Discount Rate</u>	<u>Discount Factor</u>	<u>Present Value</u>	<u>Cumulative Value</u>
Past																
2016	1.29	163,782	0.979	44,649	10,816	1.75	151,060	0.983	0	0	55,464	N/A	1.56	N/A	55,464	55,464
2017	2.13	188,325	1.000	121,095	29,334	1.75	163,496	1.000	159,895	38,732	-48,199	N/A	2.06	N/A	-48,199	7,265
2018	2.57	211,423	1.026	216,855	52,530	0.95	174,757	1.010	196,112	47,505	25,767	N/A	2.75	N/A	25,767	33,032
2019	2.63	233,075	1.053	245,350	59,433	2.16	188,261	1.031	188,266	45,605	70,912	N/A	3.40	N/A	70,912	103,944
2020	2.80	253,282	1.082	124,651	30,195	2.57	202,887	1.058	92,272	22,352	40,223	N/A	3.40	N/A	40,223	144,167
Future																
2020	2.80	253,282	1.082	149,431	36,198	2.57	202,887	1.058	110,615	26,795	48,219	0.55	3.40	0.98	47,348	191,515
2021	2.80	272,043	1.112	302,622	73,306	2.57	217,945	1.085	217,945	52,794	105,190	1.00	3.40	0.95	99,893	291,408
2022	2.80	289,359	1.144	330,892	80,154	2.57	233,443	1.113	233,443	56,548	121,055	1.00	3.40	0.92	111,180	402,588
2023	2.80	305,229	1.176	358,808	86,916	2.57	249,388	1.141	249,388	60,411	135,925	1.00	3.40	0.89	120,732	523,320
2024	2.80	319,654	1.208	386,281	93,571	2.57	265,789	1.171	265,789	64,384	149,679	1.00	3.40	0.86	128,577	651,897
2025	2.80	332,633	1.242	413,214	100,095	2.57	282,652	1.201	282,652	68,469	162,189	1.00	3.40	0.83	134,742	786,639
2026	2.80	344,167	1.277	439,507	106,464	2.57	299,985	1.232	299,985	72,667	173,319	1.00	3.40	0.80	139,253	925,892
2027	2.80	354,255	1.313	465,050	112,652	2.57	317,796	1.263	317,796	76,982	182,924	1.00	3.40	0.78	142,138	1,068,030
2028	2.80	362,898	1.349	489,727	118,630	2.57	336,090	1.296	336,090	81,413	190,853	1.00	3.40	0.75	143,423	1,211,453
2029	2.80	370,095	1.387	513,417	124,368	2.57	354,877	1.329	354,877	85,964	196,944	1.00	3.40	0.73	143,133	1,354,586
2030	2.80	375,847	1.426	535,987	129,835	2.57	374,162	1.363	374,162	90,636	201,025	1.00	3.40	0.70	141,295	1,495,881
2031	2.80	380,153	1.466	557,299	134,998	2.57	393,953	1.398	393,953	95,430	202,915	1.00	3.40	0.68	137,934	1,633,815
2032	2.80	383,014	1.507	577,207	139,820	2.57	414,256	1.434	414,256	100,348	202,423	1.00	3.40	0.66	133,075	1,766,890
2033	2.80	384,430	1.549	595,552	144,264	2.57	435,078	1.471	435,078	105,392	199,346	1.00	3.40	0.64	126,743	1,893,634
2034	2.80	384,400	1.593	612,171	148,290	2.57	456,426	1.509	456,426	110,563	193,471	1.00	3.40	0.61	118,963	2,012,597
2035	2.80	382,924	1.637	626,886	151,854	2.57	478,306	1.548	478,306	115,863	184,572	1.00	3.40	0.59	109,759	2,122,356
2036	2.80	380,003	1.683	639,513	154,913	2.57	500,723	1.587	500,723	121,293	172,410	1.00	3.40	0.58	99,156	2,221,511
2037	2.80	375,636	1.730	649,856	157,419	2.57	523,685	1.628	523,685	126,855	156,734	1.00	3.40	0.56	87,176	2,308,688
2038	2.80	369,824	1.778	657,706	159,320	2.57	547,196	1.670	547,196	132,551	137,279	1.00	3.40	0.54	73,845	2,382,532
2039	2.80	362,567	1.828	662,843	160,564	2.57	571,262	1.713	571,262	138,380	113,766	1.00	3.40	0.52	59,184	2,441,716
2040	2.80	353,864	1.879	665,037	161,096	2.57	595,887	1.757	595,887	144,345	85,900	1.00	3.40	0.50	43,218	2,484,934
2041	2.80	343,716	1.932	664,041	160,855	2.57	621,078	1.802	621,078	150,447	53,371	1.00	3.40	0.49	25,969	2,510,903
2042	2.80	332,122	1.986	659,598	159,778	2.57	646,837	1.849	646,837	156,687	15,852	1.00	3.40	0.47	7,460	2,518,363
2043	2.80	319,082	2.042	651,436	157,801	2.57	673,170	1.896	673,170	163,066	-26,999	1.00	3.40	0.46	-12,287	2,506,076
2044	2.80	304,597	2.099	639,266	154,853	2.57	700,079	1.945	700,079	169,584	-75,545	1.00	3.40	0.44	-33,250	2,472,825
2045	2.80	288,667	2.157	622,786	150,861	2.57	727,569	1.995	727,569	176,243	-130,165	1.00	3.40	0.43	-55,407	2,417,418
2046	2.80	271,291	2.218	601,678	145,748	2.57	755,642	2.046	755,642	183,044	-191,260	1.00	3.40	0.41	-78,736	2,338,683
2047	2.80	252,470	2.280	575,605	139,432	2.57	784,300	2.099	784,300	189,986	-259,249	1.00	3.40	0.40	-103,216	2,235,467
2048	2.80	232,203	2.344	544,214	131,828	2.57	813,546	2.152	813,546	197,070	-334,574	1.00	3.40	0.39	-128,825	2,106,642
2049	2.80	210,491	2.409	36,124	8,751	2.57	843,380	2.208	60,076	14,553	-29,754	0.07	3.40	0.38	-11,429	2,095,213

Table 2: Economic Losses from Lost Earnings and Lost Employment Benefits for Dr. Singh

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
<i>Year</i>	<i>Ophthalmology Wage Growth</i>	<i>Unadjusted Ophthalmologist Earnings</i>	<i>Ophthalmology Wage Growth Adjustment Factor</i>	<i>Adjusted Ophthalmologist Earnings</i>	<i>Ophthalmologist Benefits</i>	<i>Replacement Wage Growth</i>	<i>Unadjusted Replacement Earnings</i>	<i>Replacement Wage Growth Adjustment Factor</i>	<i>Adjusted Replacement Earnings</i>	<i>Replacement Benefits</i>	<i>Loss</i>	<i>Discount Period</i>	<i>Discount Rate</i>	<i>Discount Factor</i>	<i>Present Value</i>	<i>Cumulative Value</i>
Past																
2016	1.29	163,782	0.979	44,649	10,816	1.75	0	0.983	0	0	55,464	N/A	1.56	N/A	55,464	55,464
2017	2.13	188,325	1.000	121,095	29,334	1.75	0	1.000	0	0	150,429	N/A	2.06	N/A	150,429	205,893
2018	2.57	211,423	1.026	216,855	52,530	0.95	0	1.010	0	0	269,385	N/A	2.75	N/A	269,385	475,278
2019	2.63	233,075	1.053	245,350	59,433	2.16	0	1.031	0	0	304,783	N/A	3.40	N/A	304,783	780,060
2020	2.80	253,282	1.082	124,651	30,195	2.57	0	1.058	0	0	154,846	N/A	3.40	N/A	154,846	934,907
Future																
2020	2.80	253,282	1.082	149,431	36,198	2.57	0	1.058	0	0	185,629	0.55	3.40	0.98	182,276	1,117,182
2021	2.80	272,043	1.112	302,622	73,306	2.57	0	1.085	0	0	375,929	1.00	3.40	0.95	357,000	1,474,182
2022	2.80	289,359	1.144	330,892	80,154	2.57	0	1.113	0	0	411,046	1.00	3.40	0.92	377,514	1,851,696
2023	2.80	305,229	1.176	358,808	86,916	2.57	0	1.141	0	0	445,725	1.00	3.40	0.89	395,903	2,247,599
2024	2.80	319,654	1.208	386,281	93,571	2.57	0	1.171	0	0	479,852	1.00	3.40	0.86	412,200	2,659,799
2025	2.80	332,633	1.242	413,214	100,095	2.57	0	1.201	0	0	513,310	1.00	3.40	0.83	426,442	3,086,241
2026	2.80	344,167	1.277	439,507	106,464	2.57	0	1.232	0	0	545,971	1.00	3.40	0.80	438,662	3,524,903
2027	2.80	354,255	1.313	465,050	112,652	2.57	0	1.263	0	0	577,701	1.00	3.40	0.78	448,893	3,973,796
2028	2.80	362,898	1.349	489,727	118,630	2.57	0	1.296	0	0	608,357	1.00	3.40	0.75	457,170	4,430,966
2029	2.80	370,095	1.387	513,417	124,368	2.57	0	1.329	0	0	637,785	1.00	3.40	0.73	463,524	4,894,490
2030	2.80	375,847	1.426	535,987	129,835	2.57	0	1.363	0	0	665,822	1.00	3.40	0.70	467,990	5,362,479
2031	2.80	380,153	1.466	557,299	134,998	2.57	0	1.398	0	0	692,297	1.00	3.40	0.68	470,598	5,833,077
2032	2.80	383,014	1.507	577,207	139,820	2.57	0	1.434	0	0	717,027	1.00	3.40	0.66	471,381	6,304,458
2033	2.80	384,430	1.549	595,552	144,264	2.57	0	1.471	0	0	739,816	1.00	3.40	0.64	470,371	6,774,829
2034	2.80	384,400	1.593	612,171	148,290	2.57	0	1.509	0	0	760,460	1.00	3.40	0.61	467,598	7,242,427
2035	2.80	382,924	1.637	626,886	151,854	2.57	0	1.548	0	0	778,741	1.00	3.40	0.59	463,093	7,705,520
2036	2.80	380,003	1.683	639,513	154,913	2.57	0	1.587	0	0	794,427	1.00	3.40	0.58	456,887	8,162,406
2037	2.80	375,636	1.730	649,856	157,419	2.57	0	1.628	0	0	807,274	1.00	3.40	0.56	449,009	8,611,416
2038	2.80	369,824	1.778	657,706	159,320	2.57	0	1.670	0	0	817,026	1.00	3.40	0.54	439,490	9,050,906
2039	2.80	362,567	1.828	662,843	160,564	2.57	0	1.713	0	0	823,408	1.00	3.40	0.52	428,359	9,479,265
2040	2.80	353,864	1.879	665,037	161,096	2.57	0	1.757	0	0	826,132	1.00	3.40	0.50	415,645	9,894,910
2041	2.80	343,716	1.932	664,041	160,855	2.57	0	1.802	0	0	824,896	1.00	3.40	0.49	401,376	10,296,285
2042	2.80	332,122	1.986	659,598	159,778	2.57	0	1.849	0	0	819,377	1.00	3.40	0.47	385,581	10,681,866
2043	2.80	319,082	2.042	651,436	157,801	2.57	0	1.896	0	0	809,237	1.00	3.40	0.46	368,287	11,050,153
2044	2.80	304,597	2.099	639,266	154,853	2.57	0	1.945	0	0	794,119	1.00	3.40	0.44	349,523	11,399,676
2045	2.80	288,667	2.157	622,786	150,861	2.57	0	1.995	0	0	773,648	1.00	3.40	0.43	329,316	11,728,992
2046	2.80	271,291	2.218	601,678	145,748	2.57	0	2.046	0	0	747,426	1.00	3.40	0.41	307,693	12,036,685
2047	2.80	252,470	2.280	575,605	139,432	2.57	0	2.099	0	0	715,037	1.00	3.40	0.40	284,680	12,321,366
2048	2.80	232,203	2.344	544,214	131,828	2.57	0	2.152	0	0	676,042	1.00	3.40	0.39	260,305	12,581,671
2049	2.80	210,491	2.409	36,124	8,751	2.57	0	2.208	0	0	44,875	0.07	3.40	0.38	17,238	12,598,908

Table 3: Economic Losses from Lost Earnings and Lost Employment Benefits for Dr. Singh

<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	<u>11</u>	<u>12</u>	<u>13</u>	<u>14</u>	<u>15</u>	<u>16</u>	<u>17</u>
<u>Year</u>	<u>Ophthalmology Wage Growth</u>	<u>Unadjusted Ophthalmologist Earnings</u>	<u>Ophthalmology Wage Growth Adjustment Factor</u>	<u>Adjusted Ophthalmologist Earnings</u>	<u>Ophthalmologist Benefits</u>	<u>Replacement Wage Growth</u>	<u>Unadjusted Replacement Earnings</u>	<u>Replacement Wage Growth Adjustment Factor</u>	<u>Adjusted Replacement Earnings</u>	<u>Replacement Benefits</u>	<u>Loss</u>	<u>Discount Period</u>	<u>Discount Rate</u>	<u>Discount Factor</u>	<u>Present Value</u>	<u>Cumulative Value</u>
Past																
2016	1.29	277,000	0.979	44,649	10,816	1.75	151,060	0.983	0	0	55,464	N/A	1.56	N/A	55,464	55,464
2017	2.13	299,491	1.000	176,678	42,798	1.75	163,496	1.000	159,895	38,732	20,848	N/A	2.06	N/A	20,848	76,312
2018	2.57	320,605	1.026	328,841	79,657	0.95	174,757	1.010	196,112	47,505	164,881	N/A	2.75	N/A	164,881	241,193
2019	2.63	340,342	1.053	358,266	86,785	2.16	188,261	1.031	188,266	45,605	211,180	N/A	3.40	N/A	211,180	452,373
2020	2.80	358,701	1.082	176,533	42,763	2.57	202,887	1.058	92,272	22,352	104,672	N/A	3.40	N/A	104,672	557,045
Future																
2020	2.80	358,701	1.082	211,627	51,264	2.57	202,887	1.058	110,615	26,795	125,480	0.55	3.40	0.98	123,214	680,259
2021	2.80	375,684	1.112	417,914	101,234	2.57	217,945	1.085	217,945	52,794	248,409	1.00	3.40	0.95	235,901	916,160
2022	2.80	391,290	1.144	447,455	108,390	2.57	233,443	1.113	233,443	56,548	265,853	1.00	3.40	0.92	244,166	1,160,325
2023	2.80	405,519	1.176	476,703	115,475	2.57	249,388	1.141	249,388	60,411	282,379	1.00	3.40	0.89	250,815	1,411,140
2024	2.80	418,371	1.208	505,574	122,468	2.57	265,789	1.171	265,789	64,384	297,870	1.00	3.40	0.86	255,875	1,667,015
2025	2.80	429,846	1.242	533,977	129,349	2.57	282,652	1.201	282,652	68,469	312,205	1.00	3.40	0.83	259,370	1,926,386
2026	2.80	439,944	1.277	561,816	136,092	2.57	299,985	1.232	299,985	72,667	325,255	1.00	3.40	0.80	261,327	2,187,712
2027	2.80	448,665	1.313	588,986	142,674	2.57	317,796	1.263	317,796	76,982	336,883	1.00	3.40	0.78	261,769	2,449,481
2028	2.80	456,009	1.349	615,379	149,067	2.57	336,090	1.296	336,090	81,413	346,943	1.00	3.40	0.75	260,721	2,710,203
2029	2.80	461,976	1.387	640,878	155,244	2.57	354,877	1.329	354,877	85,964	355,281	1.00	3.40	0.73	258,209	2,968,411
2030	2.80	466,566	1.426	665,358	161,174	2.57	374,162	1.363	374,162	90,636	361,735	1.00	3.40	0.70	254,254	3,222,666
2031	2.80	469,779	1.466	688,688	166,825	2.57	393,953	1.398	393,953	95,430	366,131	1.00	3.40	0.68	248,882	3,471,548
2032	2.80	471,615	1.507	710,728	172,164	2.57	414,256	1.434	414,256	100,348	368,288	1.00	3.40	0.66	242,117	3,713,665
2033	2.80	472,074	1.549	731,329	177,154	2.57	435,078	1.471	435,078	105,392	368,013	1.00	3.40	0.64	233,980	3,947,645
2034	2.80	471,156	1.593	750,333	181,758	2.57	456,426	1.509	456,426	110,563	365,101	1.00	3.40	0.61	224,496	4,172,141
2035	2.80	468,861	1.637	767,573	185,934	2.57	478,306	1.548	478,306	115,863	359,338	1.00	3.40	0.59	213,687	4,385,829
2036	2.80	465,189	1.683	782,874	189,640	2.57	500,723	1.587	500,723	121,293	350,497	1.00	3.40	0.58	201,576	4,587,405
2037	2.80	460,140	1.730	796,048	192,831	2.57	523,685	1.628	523,685	126,855	338,339	1.00	3.40	0.56	188,185	4,775,590
2038	2.80	453,714	1.778	806,897	195,459	2.57	547,196	1.670	547,196	132,551	322,610	1.00	3.40	0.54	173,537	4,949,127
2039	2.80	445,911	1.828	815,212	197,474	2.57	571,262	1.713	571,262	138,380	303,044	1.00	3.40	0.52	157,652	5,106,779
2040	2.80	436,731	1.879	820,773	198,821	2.57	595,887	1.757	595,887	144,345	279,361	1.00	3.40	0.50	140,553	5,247,331
2041	2.80	426,174	1.932	823,347	199,444	2.57	621,078	1.802	621,078	150,447	251,266	1.00	3.40	0.49	122,260	5,369,592
2042	2.80	414,240	1.986	822,687	199,284	2.57	646,837	1.849	646,837	156,687	218,447	1.00	3.40	0.47	102,796	5,472,388
2043	2.80	400,929	2.042	818,534	198,278	2.57	673,170	1.896	673,170	163,066	180,577	1.00	3.40	0.46	82,181	5,554,569
2044	2.80	386,242	2.099	810,615	196,360	2.57	700,079	1.945	700,079	169,584	137,311	1.00	3.40	0.44	60,436	5,615,005
2045	2.80	370,177	2.157	798,640	193,459	2.57	727,569	1.995	727,569	176,243	88,287	1.00	3.40	0.43	37,581	5,652,586
2046	2.80	352,735	2.218	782,307	189,503	2.57	755,642	2.046	755,642	183,044	33,124	1.00	3.40	0.41	13,636	5,666,223
2047	2.80	333,916	2.280	761,295	184,413	2.57	784,300	2.099	784,300	189,986	-28,579	1.00	3.40	0.40	-11,378	5,654,844
2048	2.80	313,720	2.344	735,266	178,108	2.57	813,546	2.152	813,546	197,070	-97,242	1.00	3.40	0.39	-37,442	5,617,402
2049	2.80	292,148	2.409	50,139	12,145	2.57	843,380	2.208	60,076	14,553	-12,345	0.07	3.40	0.38	-4,742	5,612,660

Table 4: Economic Losses from Lost Earnings and Lost Employment Benefits for Dr. Singh

<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	<u>11</u>	<u>12</u>	<u>13</u>	<u>14</u>	<u>15</u>	<u>16</u>	<u>17</u>
<u>Year</u>	<u>Ophthalmology Wage Growth</u>	<u>Unadjusted Ophthalmologist Earnings</u>	<u>Ophthalmology Wage Growth Adjustment Factor</u>	<u>Adjusted Ophthalmologist Earnings</u>	<u>Ophthalmologist Benefits</u>	<u>Replacement Wage Growth</u>	<u>Unadjusted Replacement Earnings</u>	<u>Replacement Wage Growth Adjustment Factor</u>	<u>Adjusted Replacement Earnings</u>	<u>Replacement Benefits</u>	<u>Loss</u>	<u>Discount Period</u>	<u>Discount Rate</u>	<u>Discount Factor</u>	<u>Present Value</u>	<u>Cumulative Value</u>
Past																
2016	1.29	277,000	0.979	44,649	10,816	1.75	0	0.983	0	0	55,464	N/A	1.56	N/A	55,464	55,464
2017	2.13	299,491	1.000	176,678	42,798	1.75	0	1.000	0	0	219,476	N/A	2.06	N/A	219,476	274,940
2018	2.57	320,605	1.026	328,841	79,657	0.95	0	1.010	0	0	408,499	N/A	2.75	N/A	408,499	683,439
2019	2.63	340,342	1.053	358,266	86,785	2.16	0	1.031	0	0	445,051	N/A	3.40	N/A	445,051	1,128,489
2020	2.80	358,701	1.082	176,533	42,763	2.57	0	1.058	0	0	219,295	N/A	3.40	N/A	219,295	1,347,785
Future																
2020	2.80	358,701	1.082	211,627	51,264	2.57	0	1.058	0	0	262,890	0.55	3.40	0.98	258,141	1,605,926
2021	2.80	375,684	1.112	417,914	101,234	2.57	0	1.085	0	0	519,147	1.00	3.40	0.95	493,008	2,098,934
2022	2.80	391,290	1.144	447,455	108,390	2.57	0	1.113	0	0	555,844	1.00	3.40	0.92	510,500	2,609,433
2023	2.80	405,519	1.176	476,703	115,475	2.57	0	1.141	0	0	592,178	1.00	3.40	0.89	525,986	3,135,419
2024	2.80	418,371	1.208	505,574	122,468	2.57	0	1.171	0	0	628,042	1.00	3.40	0.86	539,498	3,674,917
2025	2.80	429,846	1.242	533,977	129,349	2.57	0	1.201	0	0	663,326	1.00	3.40	0.83	551,071	4,225,988
2026	2.80	439,944	1.277	561,816	136,092	2.57	0	1.232	0	0	697,908	1.00	3.40	0.80	560,735	4,786,724
2027	2.80	448,665	1.313	588,986	142,674	2.57	0	1.263	0	0	731,660	1.00	3.40	0.78	568,524	5,355,247
2028	2.80	456,009	1.349	615,379	149,067	2.57	0	1.296	0	0	764,446	1.00	3.40	0.75	574,468	5,929,716
2029	2.80	461,976	1.387	640,878	155,244	2.57	0	1.329	0	0	796,122	1.00	3.40	0.73	578,599	6,508,315
2030	2.80	466,566	1.426	665,358	161,174	2.57	0	1.363	0	0	826,532	1.00	3.40	0.70	580,949	7,089,264
2031	2.80	469,779	1.466	688,688	166,825	2.57	0	1.398	0	0	855,514	1.00	3.40	0.68	581,546	7,670,810
2032	2.80	471,615	1.507	710,728	172,164	2.57	0	1.434	0	0	882,892	1.00	3.40	0.66	580,423	8,251,233
2033	2.80	472,074	1.549	731,329	177,154	2.57	0	1.471	0	0	908,483	1.00	3.40	0.64	577,608	8,828,841
2034	2.80	471,156	1.593	750,333	181,758	2.57	0	1.509	0	0	932,090	1.00	3.40	0.61	573,131	9,401,971
2035	2.80	468,861	1.637	767,573	185,934	2.57	0	1.548	0	0	953,507	1.00	3.40	0.59	567,021	9,968,992
2036	2.80	465,189	1.683	782,874	189,640	2.57	0	1.587	0	0	972,514	1.00	3.40	0.58	559,307	10,528,300
2037	2.80	460,140	1.730	796,048	192,831	2.57	0	1.628	0	0	988,879	1.00	3.40	0.56	550,019	11,078,318
2038	2.80	453,714	1.778	806,897	195,459	2.57	0	1.670	0	0	1,002,356	1.00	3.40	0.54	539,182	11,617,501
2039	2.80	445,911	1.828	815,212	197,474	2.57	0	1.713	0	0	1,012,686	1.00	3.40	0.52	526,827	12,144,327
2040	2.80	436,731	1.879	820,773	198,821	2.57	0	1.757	0	0	1,019,594	1.00	3.40	0.50	512,979	12,657,307
2041	2.80	426,174	1.932	823,347	199,444	2.57	0	1.802	0	0	1,022,791	1.00	3.40	0.49	497,667	13,154,974
2042	2.80	414,240	1.986	822,687	199,284	2.57	0	1.849	0	0	1,021,971	1.00	3.40	0.47	480,917	13,635,891
2043	2.80	400,929	2.042	818,534	198,278	2.57	0	1.896	0	0	1,016,813	1.00	3.40	0.46	462,756	14,098,647
2044	2.80	386,242	2.099	810,615	196,360	2.57	0	1.945	0	0	1,006,975	1.00	3.40	0.44	443,210	14,541,856
2045	2.80	370,177	2.157	798,640	193,459	2.57	0	1.995	0	0	992,100	1.00	3.40	0.43	422,304	14,964,160
2046	2.80	352,735	2.218	782,307	189,503	2.57	0	2.046	0	0	971,810	1.00	3.40	0.41	400,065	15,364,225
2047	2.80	333,916	2.280	761,295	184,413	2.57	0	2.099	0	0	945,708	1.00	3.40	0.40	376,518	15,740,743
2048	2.80	313,720	2.344	735,266	178,108	2.57	0	2.152	0	0	913,374	1.00	3.40	0.39	351,688	16,092,431
2049	2.80	292,148	2.409	50,139	12,145	2.57	0	2.208	0	0	62,284	0.07	3.40	0.38	23,925	16,116,356

Table 5: Economic Losses from Lost Earnings and Lost Employment Benefits for Dr. Singh

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
<u>Year</u>	<u>Ophthalmology Wage Growth</u>	<u>Unadjusted Ophthalmologist Earnings</u>	<u>Ophthalmology Wage Growth Adjustment Factor</u>	<u>Adjusted Ophthalmologist Earnings</u>	<u>Ophthalmologist Benefits</u>	<u>Replacement Wage Growth</u>	<u>Unadjusted Replacement Earnings</u>	<u>Replacement Wage Growth Adjustment Factor</u>	<u>Adjusted Replacement Earnings</u>	<u>Replacement Benefits</u>	<u>Loss</u>	<u>Discount Period</u>	<u>Discount Rate</u>	<u>Discount Factor</u>	<u>Present Value</u>	<u>Cumulative Value</u>
Past																
2016	1.29	412,043	0.979	44,649	10,816	1.75	151,060	0.983	0	0	55,464	N/A	1.56	N/A	55,464	55,464
2017	2.13	423,653	1.000	53,865	13,048	1.75	163,496	1.000	159,895	38,732	-131,715	N/A	2.06	N/A	-131,715	-76,251
2018	2.57	434,563	1.026	55,249	13,383	0.95	174,757	1.010	196,112	47,505	-174,986	N/A	2.75	N/A	-174,986	-251,236
2019	2.63	444,775	1.053	263,179	63,751	2.16	188,261	1.031	188,266	45,605	93,059	N/A	3.40	N/A	93,059	-158,178
2020	2.80	454,286	1.082	223,574	54,158	2.57	202,887	1.058	92,272	22,352	163,109	N/A	3.40	N/A	163,109	4,931
Future																
2020	2.80	454,286	1.082	268,020	64,924	2.57	202,887	1.058	110,615	26,795	195,534	0.55	3.40	0.98	192,002	196,933
2021	2.80	463,099	1.112	515,154	124,789	2.57	217,945	1.085	217,945	52,794	369,204	1.00	3.40	0.95	350,614	547,547
2022	2.80	471,212	1.144	538,848	130,528	2.57	233,443	1.113	233,443	56,548	379,385	1.00	3.40	0.92	348,436	895,983
2023	2.80	478,625	1.176	562,642	136,292	2.57	249,388	1.141	249,388	60,411	389,135	1.00	3.40	0.89	345,639	1,241,621
2024	2.80	485,339	1.208	586,501	142,072	2.57	265,789	1.171	265,789	64,384	398,400	1.00	3.40	0.86	342,232	1,583,853
2025	2.80	491,354	1.242	610,386	147,858	2.57	282,652	1.201	282,652	68,469	407,123	1.00	3.40	0.83	338,225	1,922,079
2026	2.80	496,670	1.277	634,256	153,640	2.57	299,985	1.232	299,985	72,667	415,243	1.00	3.40	0.80	333,628	2,255,706
2027	2.80	501,286	1.313	658,065	159,407	2.57	317,796	1.263	317,796	76,982	422,695	1.00	3.40	0.78	328,448	2,584,154
2028	2.80	505,203	1.349	681,766	165,148	2.57	336,090	1.296	336,090	81,413	429,411	1.00	3.40	0.75	322,695	2,906,849
2029	2.80	508,420	1.387	705,308	170,851	2.57	354,877	1.329	354,877	85,964	435,319	1.00	3.40	0.73	316,378	3,223,227
2030	2.80	510,938	1.426	728,637	176,502	2.57	374,162	1.363	374,162	90,636	440,342	1.00	3.40	0.70	309,505	3,532,732
2031	2.80	512,757	1.466	751,694	182,087	2.57	393,953	1.398	393,953	95,430	444,399	1.00	3.40	0.68	302,086	3,834,818
2032	2.80	513,876	1.507	774,417	187,592	2.57	414,256	1.434	414,256	100,348	447,404	1.00	3.40	0.66	294,129	4,128,946
2033	2.80	514,296	1.549	796,739	192,999	2.57	435,078	1.471	435,078	105,392	449,268	1.00	3.40	0.64	285,642	4,414,588
2034	2.80	514,017	1.593	818,590	198,292	2.57	456,426	1.509	456,426	110,563	449,893	1.00	3.40	0.61	276,634	4,691,222
2035	2.80	513,038	1.637	839,896	203,453	2.57	478,306	1.548	478,306	115,863	449,180	1.00	3.40	0.59	267,113	4,958,335
2036	2.80	511,360	1.683	860,576	208,462	2.57	500,723	1.587	500,723	121,293	447,021	1.00	3.40	0.58	257,089	5,215,424
2037	2.80	508,982	1.730	880,545	213,300	2.57	523,685	1.628	523,685	126,855	443,305	1.00	3.40	0.56	246,568	5,461,992
2038	2.80	505,905	1.778	899,715	217,943	2.57	547,196	1.670	547,196	132,551	437,912	1.00	3.40	0.54	235,559	5,697,551
2039	2.80	502,129	1.828	917,989	222,370	2.57	571,262	1.713	571,262	138,380	430,718	1.00	3.40	0.52	224,071	5,921,623
2040	2.80	497,653	1.879	935,268	226,556	2.57	595,887	1.757	595,887	144,345	421,590	1.00	3.40	0.50	212,111	6,133,734
2041	2.80	492,478	1.932	951,443	230,474	2.57	621,078	1.802	621,078	150,447	410,392	1.00	3.40	0.49	199,687	6,333,421
2042	2.80	486,604	1.986	966,402	234,097	2.57	646,837	1.849	646,837	156,687	396,975	1.00	3.40	0.47	186,808	6,520,228
2043	2.80	480,030	2.042	980,025	237,397	2.57	673,170	1.896	673,170	163,066	381,187	1.00	3.40	0.46	173,480	6,693,708
2044	2.80	472,757	2.099	992,187	240,343	2.57	700,079	1.945	700,079	169,584	362,866	1.00	3.40	0.44	159,712	6,853,420
2045	2.80	464,784	2.157	1,002,752	242,903	2.57	727,569	1.995	727,569	176,243	341,842	1.00	3.40	0.43	145,511	6,998,931
2046	2.80	456,112	2.218	1,011,581	245,041	2.57	755,642	2.046	755,642	183,044	317,937	1.00	3.40	0.41	130,885	7,129,816
2047	2.80	446,741	2.280	1,018,525	246,723	2.57	784,300	2.099	784,300	189,986	290,962	1.00	3.40	0.40	115,842	7,245,658
2048	2.80	436,671	2.344	1,023,425	247,910	2.57	813,546	2.152	813,546	197,070	260,719	1.00	3.40	0.39	100,388	7,346,046
2049	2.80	425,901	2.409	73,093	17,706	2.57	843,380	2.208	60,076	14,553	16,170	0.07	3.40	0.38	6,211	7,352,257

Table 6: Economic Losses from Lost Earnings and Lost Employment Benefits for Dr. Singh

<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	<u>11</u>	<u>12</u>	<u>13</u>	<u>14</u>	<u>15</u>	<u>16</u>	<u>17</u>
<i>Year</i>	<i>Ophthalmology Wage Growth</i>	<i>Unadjusted Ophthalmologist Earnings</i>	<i>Ophthalmology Wage Growth Adjustment Factor</i>	<i>Adjusted Ophthalmologist Earnings</i>	<i>Ophthalmologist Benefits</i>	<i>Replacement Wage Growth</i>	<i>Unadjusted Replacement Wage Earnings</i>	<i>Replacement Wage Growth Adjustment Factor</i>	<i>Adjusted Replacement Wage Earnings</i>	<i>Replacement Benefits</i>	<i>Loss</i>	<i>Discount Period</i>	<i>Discount Rate</i>	<i>Discount Factor</i>	<i>Present Value</i>	<i>Cumulative Value</i>
Past																
2016	1.29	412,043	0.979	44,649	10,816	1.75	0	0.983	0	0	55,464	N/A	1.56	N/A	55,464	55,464
2017	2.13	423,653	1.000	53,865	13,048	1.75	0	1.000	0	0	66,913	N/A	2.06	N/A	66,913	122,377
2018	2.57	434,563	1.026	55,249	13,383	0.95	0	1.010	0	0	68,632	N/A	2.75	N/A	68,632	191,009
2019	2.63	444,775	1.053	263,179	63,751	2.16	0	1.031	0	0	326,930	N/A	3.40	N/A	326,930	517,939
2020	2.80	454,286	1.082	223,574	54,158	2.57	0	1.058	0	0	277,732	N/A	3.40	N/A	277,732	795,671
Future																
2020	2.80	454,286	1.082	268,020	64,924	2.57	0	1.058	0	0	332,944	0.55	3.40	0.98	326,930	1,122,600
2021	2.80	463,099	1.112	515,154	124,789	2.57	0	1.085	0	0	639,943	1.00	3.40	0.95	607,721	1,730,321
2022	2.80	471,212	1.144	538,848	130,528	2.57	0	1.113	0	0	669,376	1.00	3.40	0.92	614,770	2,345,091
2023	2.80	478,625	1.176	562,642	136,292	2.57	0	1.141	0	0	698,934	1.00	3.40	0.89	620,809	2,965,900
2024	2.80	485,339	1.208	586,501	142,072	2.57	0	1.171	0	0	728,573	1.00	3.40	0.86	625,856	3,591,755
2025	2.80	491,354	1.242	610,386	147,858	2.57	0	1.201	0	0	758,244	1.00	3.40	0.83	629,926	4,221,681
2026	2.80	496,670	1.277	634,256	153,640	2.57	0	1.232	0	0	787,895	1.00	3.40	0.80	633,036	4,854,717
2027	2.80	501,286	1.313	658,065	159,407	2.57	0	1.263	0	0	817,472	1.00	3.40	0.78	635,203	5,489,920
2028	2.80	505,203	1.349	681,766	165,148	2.57	0	1.296	0	0	846,915	1.00	3.40	0.75	636,442	6,126,362
2029	2.80	508,420	1.387	705,308	170,851	2.57	0	1.329	0	0	876,160	1.00	3.40	0.73	636,769	6,763,131
2030	2.80	510,938	1.426	728,637	176,502	2.57	0	1.363	0	0	905,139	1.00	3.40	0.70	636,200	7,399,330
2031	2.80	512,757	1.466	751,694	182,087	2.57	0	1.398	0	0	933,781	1.00	3.40	0.68	634,750	8,034,080
2032	2.80	513,876	1.507	774,417	187,592	2.57	0	1.434	0	0	962,008	1.00	3.40	0.66	632,435	8,666,514
2033	2.80	514,296	1.549	796,739	192,999	2.57	0	1.471	0	0	989,738	1.00	3.40	0.64	629,269	9,295,784
2034	2.80	514,017	1.593	818,590	198,292	2.57	0	1.509	0	0	1,016,882	1.00	3.40	0.61	625,268	9,921,052
2035	2.80	513,038	1.637	839,896	203,453	2.57	0	1.548	0	0	1,043,349	1.00	3.40	0.59	620,447	10,541,499
2036	2.80	511,360	1.683	860,576	208,462	2.57	0	1.587	0	0	1,069,038	1.00	3.40	0.58	614,820	11,156,319
2037	2.80	508,982	1.730	880,545	213,300	2.57	0	1.628	0	0	1,093,845	1.00	3.40	0.56	608,401	11,764,720
2038	2.80	505,905	1.778	899,715	217,943	2.57	0	1.670	0	0	1,117,658	1.00	3.40	0.54	601,205	12,365,925
2039	2.80	502,129	1.828	917,989	222,370	2.57	0	1.713	0	0	1,140,359	1.00	3.40	0.52	593,246	12,959,171
2040	2.80	497,653	1.879	935,268	226,556	2.57	0	1.757	0	0	1,161,823	1.00	3.40	0.50	584,538	13,543,709
2041	2.80	492,478	1.932	951,443	230,474	2.57	0	1.802	0	0	1,181,917	1.00	3.40	0.49	575,094	14,118,803
2042	2.80	486,604	1.986	966,402	234,097	2.57	0	1.849	0	0	1,200,499	1.00	3.40	0.47	564,928	14,683,731
2043	2.80	480,030	2.042	980,025	237,397	2.57	0	1.896	0	0	1,217,423	1.00	3.40	0.46	554,054	15,237,786
2044	2.80	472,757	2.099	992,187	240,343	2.57	0	1.945	0	0	1,232,530	1.00	3.40	0.44	542,485	15,780,271
2045	2.80	464,784	2.157	1,002,752	242,903	2.57	0	1.995	0	0	1,245,655	1.00	3.40	0.43	530,234	16,310,505
2046	2.80	456,112	2.218	1,011,581	245,041	2.57	0	2.046	0	0	1,256,623	1.00	3.40	0.41	517,314	16,827,819
2047	2.80	446,741	2.280	1,018,525	246,723	2.57	0	2.099	0	0	1,265,248	1.00	3.40	0.40	503,738	17,331,557
2048	2.80	436,671	2.344	1,024,422	247,910	2.57	0	2.155	0	0	1,271,858	1.00	3.40	0.39	489,518	17,821,074
2049	2.80	425,901	2.409	73,093	17,706	2.57	0	2.208	0	0	90,799	0.07	3.40	0.38	34,878	17,855,953

Table 7: Economic Losses from Lost Earnings and Lost Employment Benefits for Dr. Singh

<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	<u>11</u>	<u>12</u>	<u>13</u>	<u>14</u>	<u>15</u>	<u>16</u>	<u>17</u>
<u>Year</u>	<u>Ophthalmology Wage Growth</u>	<u>Unadjusted Ophthalmologist Earnings</u>	<u>Ophthalmology Wage Growth Adjustment Factor</u>	<u>Adjusted Ophthalmologist Earnings</u>	<u>Ophthalmologist Benefits</u>	<u>Replacement Wage Growth</u>	<u>Unadjusted Replacement Earnings</u>	<u>Replacement Wage Growth Adjustment Factor</u>	<u>Adjusted Replacement Earnings</u>	<u>Replacement Benefits</u>	<u>Loss</u>	<u>Discount Period</u>	<u>Discount Rate</u>	<u>Discount Factor</u>	<u>Present Value</u>	<u>Cumulative Value</u>
Past																
2016	1.29	163,782	0.979	44,649	10,816	1.75	151,060	0.983	0	0	55,464	N/A	1.56	N/A	55,464	55,464
2017	2.13	188,325	1.000	121,095	29,334	1.75	163,496	1.000	79,948	19,366	51,115	N/A	2.06	N/A	51,115	106,579
2018	2.57	211,423	1.026	216,855	52,530	0.95	174,757	1.010	98,056	23,753	147,576	N/A	2.75	N/A	147,576	254,155
2019	2.63	233,075	1.053	245,350	59,433	2.16	188,261	1.031	94,133	22,802	187,847	N/A	3.40	N/A	187,847	442,002
2020	2.80	253,282	1.082	124,651	30,195	2.57	202,887	1.058	39,795	9,640	105,412	N/A	3.40	N/A	105,412	547,414
Future																
2020	2.80	253,282	1.082	149,431	36,198	2.57	202,887	1.058	47,705	11,556	126,367	0.55	3.40	0.98	124,085	671,499
2021	2.80	272,043	1.112	302,622	73,306	2.57	217,945	1.085	87,500	21,196	267,233	1.00	3.40	0.95	253,777	925,276
2022	2.80	289,359	1.144	330,892	80,154	2.57	233,443	1.113	87,500	21,196	302,351	1.00	3.40	0.92	277,686	1,202,962
2023	2.80	305,229	1.176	358,808	86,916	2.57	249,388	1.141	87,500	21,196	337,029	1.00	3.40	0.89	299,357	1,502,318
2024	2.80	319,654	1.208	386,281	93,571	2.57	265,789	1.171	87,500	21,196	371,156	1.00	3.40	0.86	318,829	1,821,147
2025	2.80	332,633	1.242	413,214	100,095	2.57	282,652	1.201	87,500	21,196	404,614	1.00	3.40	0.83	336,141	2,157,288
2026	2.80	344,167	1.277	439,507	106,464	2.57	299,985	1.232	87,500	21,196	437,275	1.00	3.40	0.80	351,330	2,508,618
2027	2.80	354,255	1.313	465,050	112,652	2.57	317,796	1.263	87,500	21,196	469,006	1.00	3.40	0.78	364,433	2,873,051
2028	2.80	362,898	1.349	489,727	118,630	2.57	336,090	1.296	87,500	21,196	499,661	1.00	3.40	0.75	375,487	3,248,538
2029	2.80	370,095	1.387	513,417	124,368	2.57	354,877	1.329	87,500	21,196	529,089	1.00	3.40	0.73	384,527	3,633,065
2030	2.80	375,847	1.426	535,987	129,835	2.57	374,162	1.363	87,500	21,196	557,127	1.00	3.40	0.70	391,590	4,024,655
2031	2.80	380,153	1.466	557,299	134,998	2.57	393,953	1.398	87,500	21,196	583,602	1.00	3.40	0.68	396,711	4,421,366
2032	2.80	383,014	1.507	577,207	139,820	2.57	414,256	1.434	87,500	21,196	608,331	1.00	3.40	0.66	399,923	4,821,290
2033	2.80	384,430	1.549	595,552	144,264	2.57	435,078	1.471	87,500	21,196	631,121	1.00	3.40	0.64	401,263	5,222,552
2034	2.80	384,400	1.593	612,171	148,290	2.57	456,426	1.509	87,500	21,196	651,765	1.00	3.40	0.61	400,762	5,623,314
2035	2.80	382,924	1.637	626,886	151,854	2.57	478,306	1.548	87,500	21,196	670,045	1.00	3.40	0.59	398,455	6,021,769
2036	2.80	380,003	1.683	639,513	154,913	2.57	500,723	1.587	87,500	21,196	685,731	1.00	3.40	0.58	394,374	6,416,143
2037	2.80	375,636	1.730	649,856	157,419	2.57	523,685	1.628	87,500	21,196	698,579	1.00	3.40	0.56	388,552	6,804,696
2038	2.80	369,824	1.778	657,706	159,320	2.57	547,196	1.670	87,500	21,196	708,330	1.00	3.40	0.54	381,021	7,185,717
2039	2.80	362,567	1.828	662,843	160,564	2.57	571,262	1.713	87,500	21,196	714,712	1.00	3.40	0.52	371,813	7,557,530
2040	2.80	353,864	1.879	665,037	161,096	2.57	595,887	1.757	87,500	21,196	717,437	1.00	3.40	0.50	360,958	7,918,487
2041	2.80	343,716	1.932	664,041	160,855	2.57	621,078	1.802	87,500	21,196	716,200	1.00	3.40	0.49	348,487	8,266,974
2042	2.80	332,122	1.986	659,598	159,778	2.57	646,837	1.849	87,500	21,196	710,681	1.00	3.40	0.47	334,431	8,601,405
2043	2.80	319,082	2.042	651,436	157,801	2.57	673,170	1.896	87,500	21,196	700,541	1.00	3.40	0.46	318,819	8,920,224
2044	2.80	304,597	2.099	639,266	154,853	2.57	700,079	1.945	87,500	21,196	685,424	1.00	3.40	0.44	301,682	9,221,906
2045	2.80	288,667	2.157	622,786	150,861	2.57	727,569	1.995	87,500	21,196	664,952	1.00	3.40	0.43	283,048	9,504,954
2046	2.80	271,291	2.218	601,678	145,748	2.57	755,642	2.046	87,500	21,196	638,731	1.00	3.40	0.41	262,946	9,767,900
2047	2.80	252,470	2.280	575,605	139,432	2.57	784,300	2.099	87,500	21,196	606,342	1.00	3.40	0.40	241,405	10,009,305
2048	2.80	232,203	2.344	544,214	131,828	2.57	813,546	2.152	87,500	21,196	567,346	1.00	3.40	0.39	218,452	10,227,758
2049	2.80	210,491	2.409	36,124	8,751	2.57	843,380	2.208	6,233	1,510	37,132	0.07	3.40	0.38	14,264	10,242,021

Table 8: Economic Losses from Lost Earnings and Lost Employment Benefits for Dr. Singh

<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	<u>11</u>	<u>12</u>	<u>13</u>	<u>14</u>	<u>15</u>	<u>16</u>	<u>17</u>
<i>Year</i>	<i>Ophthalmology Wage Growth</i>	<i>Unadjusted Ophthalmologist Earnings</i>	<i>Ophthalmology Wage Growth Adjustment Factor</i>	<i>Adjusted Ophthalmologist Earnings</i>	<i>Ophthalmologist Benefits</i>	<i>Replacement Wage Growth</i>	<i>Unadjusted Replacement Earnings</i>	<i>Replacement Wage Growth Adjustment Factor</i>	<i>Adjusted Replacement Earnings</i>	<i>Replacement Benefits</i>	<i>Loss</i>	<i>Discount Period</i>	<i>Discount Rate</i>	<i>Discount Factor</i>	<i>Present Value</i>	<i>Cumulative Value</i>
Past																
2016	1.29	277,000	0.979	44,649	10,816	1.75	151,060	0.983	0	0	55,464	N/A	1.56	N/A	55,464	55,464
2017	2.13	299,491	1.000	176,678	42,798	1.75	163,496	1.000	79,948	19,366	120,162	N/A	2.06	N/A	120,162	175,626
2018	2.57	320,605	1.026	328,841	79,657	0.95	174,757	1.010	98,056	23,753	286,690	N/A	2.75	N/A	286,690	462,316
2019	2.63	340,342	1.053	358,266	86,785	2.16	188,261	1.031	94,133	22,802	328,115	N/A	3.40	N/A	328,115	790,431
2020	2.80	358,701	1.082	176,533	42,763	2.57	202,887	1.058	39,795	9,640	169,861	N/A	3.40	N/A	169,861	960,292
Future																
2020	2.80	358,701	1.082	211,627	51,264	2.57	202,887	1.058	47,705	11,556	203,629	0.55	3.40	0.98	199,950	1,160,243
2021	2.80	375,684	1.112	417,914	101,234	2.57	217,945	1.085	87,500	21,196	410,452	1.00	3.40	0.95	389,785	1,550,028
2022	2.80	391,290	1.144	447,455	108,390	2.57	233,443	1.113	87,500	21,196	447,149	1.00	3.40	0.92	410,671	1,960,699
2023	2.80	405,519	1.176	476,703	115,475	2.57	249,388	1.141	87,500	21,196	483,482	1.00	3.40	0.89	429,440	2,390,138
2024	2.80	418,371	1.208	505,574	122,468	2.57	265,789	1.171	87,500	21,196	519,347	1.00	3.40	0.86	446,127	2,836,266
2025	2.80	429,846	1.242	533,977	129,349	2.57	282,652	1.201	87,500	21,196	554,630	1.00	3.40	0.83	460,770	3,297,035
2026	2.80	439,944	1.277	561,816	136,092	2.57	299,985	1.232	87,500	21,196	589,212	1.00	3.40	0.80	473,404	3,770,439
2027	2.80	448,665	1.313	588,986	142,674	2.57	317,796	1.263	87,500	21,196	622,964	1.00	3.40	0.78	484,064	4,254,503
2028	2.80	456,009	1.349	615,379	149,067	2.57	336,090	1.296	87,500	21,196	655,751	1.00	3.40	0.75	492,785	4,747,288
2029	2.80	461,976	1.387	640,878	155,244	2.57	354,877	1.329	87,500	21,196	687,426	1.00	3.40	0.73	499,602	5,246,891
2030	2.80	466,566	1.426	665,358	161,174	2.57	374,162	1.363	87,500	21,196	717,837	1.00	3.40	0.70	504,549	5,751,440
2031	2.80	469,779	1.466	688,688	166,825	2.57	393,953	1.398	87,500	21,196	746,818	1.00	3.40	0.68	507,659	6,259,099
2032	2.80	471,615	1.507	710,728	172,164	2.57	414,256	1.434	87,500	21,196	774,196	1.00	3.40	0.66	508,965	6,768,064
2033	2.80	472,074	1.549	731,329	177,154	2.57	435,078	1.471	87,500	21,196	799,787	1.00	3.40	0.64	508,500	7,276,564
2034	2.80	471,156	1.593	750,333	181,758	2.57	456,426	1.509	87,500	21,196	823,394	1.00	3.40	0.61	506,295	7,782,859
2035	2.80	468,861	1.637	767,573	185,934	2.57	478,306	1.548	87,500	21,196	844,811	1.00	3.40	0.59	502,383	8,285,242
2036	2.80	465,189	1.683	782,874	189,640	2.57	500,723	1.587	87,500	21,196	863,818	1.00	3.40	0.58	496,795	8,782,037
2037	2.80	460,140	1.730	796,048	192,831	2.57	523,685	1.628	87,500	21,196	880,183	1.00	3.40	0.56	489,562	9,271,598
2038	2.80	453,714	1.778	806,897	195,459	2.57	547,196	1.670	87,500	21,196	893,660	1.00	3.40	0.54	480,713	9,752,312
2039	2.80	445,911	1.828	815,212	197,474	2.57	571,262	1.713	87,500	21,196	903,990	1.00	3.40	0.52	470,280	10,222,592
2040	2.80	436,731	1.879	820,773	198,821	2.57	595,887	1.757	87,500	21,196	910,898	1.00	3.40	0.50	458,292	10,680,884
2041	2.80	426,174	1.932	823,347	199,444	2.57	621,078	1.802	87,500	21,196	914,095	1.00	3.40	0.49	444,778	11,125,662
2042	2.80	414,240	1.986	822,687	199,284	2.57	646,837	1.849	87,500	21,196	913,276	1.00	3.40	0.47	429,767	11,555,430
2043	2.80	400,929	2.042	818,534	198,278	2.57	673,170	1.896	87,500	21,196	908,117	1.00	3.40	0.46	413,288	11,968,718
2044	2.80	386,242	2.099	810,615	196,360	2.57	700,079	1.945	87,500	21,196	898,279	1.00	3.40	0.44	395,368	12,364,086
2045	2.80	370,177	2.157	798,640	193,459	2.57	727,569	1.995	87,500	21,196	883,404	1.00	3.40	0.43	376,036	12,740,122
2046	2.80	352,735	2.218	782,307	189,503	2.57	755,642	2.046	87,500	21,196	863,114	1.00	3.40	0.41	355,318	13,095,440
2047	2.80	333,916	2.280	761,295	184,413	2.57	784,300	2.099	87,500	21,196	837,012	1.00	3.40	0.40	333,243	13,428,683
2048	2.80	313,720	2.344	735,266	178,108	2.57	813,546	2.152	87,500	21,196	804,679	1.00	3.40	0.39	309,835	13,738,518
2049	2.80	292,148	2.409	50,139	12,145	2.57	843,380	2.208	6,233	1,510	54,541	0.07	3.40	0.38	20,951	13,759,469

Table 9: Economic Losses from Lost Earnings and Lost Employment Benefits for Dr. Singh

<u>1</u>	<u>2</u>	<u>3</u>	<u>4</u>	<u>5</u>	<u>6</u>	<u>7</u>	<u>8</u>	<u>9</u>	<u>10</u>	<u>11</u>	<u>12</u>	<u>13</u>	<u>14</u>	<u>15</u>	<u>16</u>	<u>17</u>
<u>Year</u>	<u>Ophthalmology Wage Growth</u>	<u>Unadjusted Ophthalmologist Earnings</u>	<u>Ophthalmology Wage Growth Adjustment Factor</u>	<u>Adjusted Ophthalmologist Earnings</u>	<u>Ophthalmologist Benefits</u>	<u>Replacement Wage Growth</u>	<u>Unadjusted Replacement Earnings</u>	<u>Replacement Wage Growth Adjustment Factor</u>	<u>Adjusted Replacement Earnings</u>	<u>Replacement Benefits</u>	<u>Loss</u>	<u>Discount Period</u>	<u>Discount Rate</u>	<u>Discount Factor</u>	<u>Present Value</u>	<u>Cumulative Value</u>
Past																
2016	1.29	412,043	0.979	44,649	10,816	1.75	151,060	0.983	0	0	55,464	N/A	1.56	N/A	55,464	55,464
2017	2.13	423,653	1.000	53,865	13,048	1.75	163,496	1.000	79,948	19,366	-32,401	N/A	2.06	N/A	-32,401	23,063
2018	2.57	434,563	1.026	55,249	13,383	0.95	174,757	1.010	98,056	23,753	-53,177	N/A	2.75	N/A	-53,177	-30,114
2019	2.63	444,775	1.053	263,179	63,751	2.16	188,261	1.031	94,133	22,802	209,994	N/A	3.40	N/A	209,994	179,881
2020	2.80	454,286	1.082	223,574	54,158	2.57	202,887	1.058	39,795	9,640	228,298	N/A	3.40	N/A	228,298	408,178
Future																
2020	2.80	454,286	1.082	268,020	64,924	2.57	202,887	1.058	47,705	11,556	273,682	0.55	3.40	0.98	268,739	676,917
2021	2.80	463,099	1.112	515,154	124,789	2.57	217,945	1.085	87,500	21,196	531,247	1.00	3.40	0.95	504,498	1,181,415
2022	2.80	471,212	1.144	538,848	130,528	2.57	233,443	1.113	87,500	21,196	560,680	1.00	3.40	0.92	514,941	1,696,356
2023	2.80	478,625	1.176	562,642	136,292	2.57	249,388	1.141	87,500	21,196	590,239	1.00	3.40	0.89	524,263	2,220,619
2024	2.80	485,339	1.208	586,501	142,072	2.57	265,789	1.171	87,500	21,196	619,877	1.00	3.40	0.86	532,484	2,753,104
2025	2.80	491,354	1.242	610,386	147,858	2.57	282,652	1.201	87,500	21,196	649,548	1.00	3.40	0.83	539,625	3,292,729
2026	2.80	496,670	1.277	634,256	153,640	2.57	299,985	1.232	87,500	21,196	679,200	1.00	3.40	0.80	545,704	3,838,433
2027	2.80	501,286	1.313	658,065	159,407	2.57	317,796	1.263	87,500	21,196	708,776	1.00	3.40	0.78	550,743	4,389,176
2028	2.80	505,203	1.349	681,766	165,148	2.57	336,090	1.296	87,500	21,196	738,219	1.00	3.40	0.75	554,759	4,943,934
2029	2.80	508,420	1.387	705,308	170,851	2.57	354,877	1.329	87,500	21,196	767,464	1.00	3.40	0.73	557,772	5,501,706
2030	2.80	510,938	1.426	728,637	176,502	2.57	374,162	1.363	87,500	21,196	796,444	1.00	3.40	0.70	559,800	6,061,506
2031	2.80	512,757	1.466	751,694	182,087	2.57	393,953	1.398	87,500	21,196	825,086	1.00	3.40	0.68	560,863	6,622,369
2032	2.80	513,876	1.507	774,417	187,592	2.57	414,256	1.434	87,500	21,196	853,312	1.00	3.40	0.66	560,977	7,183,346
2033	2.80	514,296	1.549	796,739	192,999	2.57	435,078	1.471	87,500	21,196	881,042	1.00	3.40	0.64	560,161	7,743,507
2034	2.80	514,017	1.593	818,590	198,292	2.57	456,426	1.509	87,500	21,196	908,187	1.00	3.40	0.61	558,433	8,301,939
2035	2.80	513,038	1.637	839,896	203,453	2.57	478,306	1.548	87,500	21,196	934,653	1.00	3.40	0.59	555,809	8,857,749
2036	2.80	511,360	1.683	860,576	208,462	2.57	500,723	1.587	87,500	21,196	960,342	1.00	3.40	0.58	552,307	9,410,056
2037	2.80	508,982	1.730	880,545	213,300	2.57	523,685	1.628	87,500	21,196	985,149	1.00	3.40	0.56	547,944	9,958,000
2038	2.80	505,905	1.778	899,715	217,943	2.57	547,196	1.670	87,500	21,196	1,008,963	1.00	3.40	0.54	542,736	10,500,736
2039	2.80	502,129	1.828	917,989	222,370	2.57	571,262	1.713	87,500	21,196	1,031,664	1.00	3.40	0.52	536,700	11,037,436
2040	2.80	497,653	1.879	935,268	226,556	2.57	595,887	1.757	87,500	21,196	1,053,127	1.00	3.40	0.50	529,851	11,567,286
2041	2.80	492,478	1.932	951,443	230,474	2.57	621,078	1.802	87,500	21,196	1,073,221	1.00	3.40	0.49	522,205	12,089,492
2042	2.80	486,604	1.986	966,402	234,097	2.57	646,837	1.849	87,500	21,196	1,091,804	1.00	3.40	0.47	513,779	12,603,270
2043	2.80	480,030	2.042	980,025	237,397	2.57	673,170	1.896	87,500	21,196	1,108,727	1.00	3.40	0.46	504,587	13,107,857
2044	2.80	472,757	2.099	992,187	240,343	2.57	700,079	1.945	87,500	21,196	1,123,834	1.00	3.40	0.44	494,644	13,602,501
2045	2.80	464,784	2.157	1,002,752	242,903	2.57	727,569	1.995	87,500	21,196	1,136,959	1.00	3.40	0.43	483,966	14,086,467
2046	2.80	456,112	2.218	1,011,581	245,041	2.57	755,642	2.046	87,500	21,196	1,147,927	1.00	3.40	0.41	472,567	14,559,034
2047	2.80	446,741	2.280	1,018,525	246,723	2.57	784,300	2.099	87,500	21,196	1,156,552	1.00	3.40	0.40	460,462	15,019,496
2048	2.80	436,671	2.344	1,023,425	247,910	2.57	813,546	2.152	87,500	21,196	1,162,640	1.00	3.40	0.39	447,665	15,467,161
2049	2.80	425,901	2.409	73,093	17,706	2.57	843,380	2.208	6,233	1,510	83,056	0.07	3.40	0.38	31,904	15,499,066

Notes to Tables

1. Year. The analysis date is June 10, 2020.
2. Ophthalmology wage growth rate.
3. Unadjusted ophthalmology earnings.
4. Ophthalmology wage growth adjustment factor.
5. Ophthalmology earnings equals unadjusted ophthalmology earnings multiplied by the ophthalmology wage growth adjustment factor.
6. Ophthalmology employment benefits.
7. Replacement wage growth rate.
8. Unadjusted replacement earnings.
9. Replacement wage growth adjustment factor.
10. Replacement earnings equals unadjusted replacement earnings multiplied by the replacement wage growth adjustment factor.
11. Replacement employment benefits.
12. Loss equals the difference in ophthalmology earnings and employment benefits and replacement earnings and employment benefits.
13. Discount Period.
14. Discount rate.
15. Discount factor.
16. Present value of economic losses.
17. Cumulative present value of economic losses.

Exhibit A: Charles Baum's Resume

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EMPLOYMENT

Middle Tennessee State University

Professor of Economics (2010-present)
 Chair, Department of Economics and Finance (2008-2014)
 Associate Professor of Economics (2004-2010)
 Director of the Economics Graduate Programs (2004-2008)
 Assistant Professor of Economics (1999-2004)

Baum Economics LLC

Member (2015-present)

EDUCATION

Ph.D., Economics, University of North Carolina at Chapel Hill (1999)

B.A., Economics, Wake Forest University (1995)

B.A., Political Science, Wake Forest University (1995)

RESEARCH INTERESTS / SPECIALTIES: Labor Economics, Employment, Wages, Earnings, Employment Benefits, Unemployment, Retirement Decisions, Worklife Expectancies, and Social Security Income and Benefits

PUBLICATIONS

Owens, Mark F., Adam D. Rennhoff, and Charles L. Baum. (2018). "Consumer Demand for Charitable Purchases: Evidence from a Field Experiment on Girl Scout Cookie Sales." *Journal of Economic Behavior and Organization*, 152 (1): 47-63.

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ASSOCIATIONS

American Association of Economic and Financial Experts (AAEFE)

National Association of Forensic Economics (NAFE)

PRESENTATIONS (RECENT, SELECTED)

Seven Careers in a Lifetime? An Analysis of Employee Tenure. American Economic Association, Allied Social Science Association Annual Meetings, San Diego, CA, January 2020.

Calculating Economic Losses in Personal Injury and Wrongful Death Cases in Tennessee. Law Conference for Tennessee Practitioners, Nashville School of Law, Nashville, TN, November 2019.

The State and U.S. Economic Forecast. The Exchange Club, Murfreesboro, TN, August 2019.

How to Calculate Economic Damages in Medical Malpractice Wrongful Death and Personal Injury Cases in Tennessee. The 2019 Medical Malpractice Conference for Tennessee Attorneys, Nashville, TN, May 2019.

How to Calculate Economic Damages in Medical Malpractice Wrongful Death and Personal Injury Cases in Alabama. The 2019 Medical Malpractice Conference for Alabama Attorneys, Birmingham, AL, May 2019.

The U.S. Economic Forecast. Tennessee Realtors Association, 2019 Excel Summit, Franklin, TN, March 2019.

Calculating Economic Losses in Personal Injury and Wrongful Death Cases in Tennessee. Law Conference for Tennessee Practitioners, Nashville School of Law, Nashville, TN, November 2018.

Economics 101: Where are We and Where are We Going? Mid-South Commercial Law Institute, Nashville, TN, October 2017.

Calculating Hedonic Damages in Arkansas. National Association of Forensic Economics, Winter Meetings, Cancun, Mexico, January 2017.

The Economic Impacts of Wrongful Incarceration. National Association of Forensic Economics, Winter Meetings, Cancun, Mexico, January 2017.

The Accuracy of Social Security Wage Projections. National Association of Forensic Economics, Winter Meetings, Key West, FL, January 2016.

Calculating Economic Losses in Personal Injury and Wrongful Death Cases in Alabama. Huntsville Bar Association, Huntsville, AL, May 2016.

Employee Tenure and Economic Losses. National Association of Forensic Economics, Winter Meetings, San Juan, Puerto Rico, January 2015.

TESTIMONY (DEPOSITION AND TRIAL)

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA, EASTERN DIVISION, DARRYL E. CROMPTON, Plaintiff, v. TUSKEGEE UNIVERSITY, and MATTHEW JENKINS, D.V.M., Individually, Defendants, 3:14-CV-1189-WHA-CSC. October 27, 2015 (Deposition).

IN THE CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE, MARGIE DYLEWSKI, individually and as the surviving spouse and next of kin of STEVE DYLEWSKI, deceased, Plaintiff, v. Defendants, CASE NO. 1-388-14. February 11, 2016. (Deposition).

IN THE CIRCUIT COURT OF TUSCALOOSA COUNTY, ALABAMA, LOREN MORROW, BRITTNEY C. GRAY, AND STEPHANIE LAMPLEY, Plaintiffs, v. STILLMAN COLLEGE, Defendant. March 22, 2016. (Deposition).

IN THE CIRCUIT COURT FOR DEKALB COUNTY, TENNESSEE AT SMITHVILLE, TINA LOUISE WRIGHT, Plaintiff, v. OMEGA APPAREL INCORPORATED, Defendant, NO. 2015-CV-21. April 7, 2016. (Deposition).

IN THE CIRCUIT COURT FOR MARSHALL COUNTY, TENNESSEE AT LEWISBURG, TERRY WALLACE, Plaintiff, v. CITY OF LEWISBURG, TENNESSEE, Defendant. April 26, 2016. (Trial).

IN THE CIRCUIT COURT FOR COFFEE COUNTY, TENNESSEE, SUSAN WALTON, individually and as surviving spouse and next of kin of JAMES WALTON, deceased, Plaintiff, v. TULLAHOMA HMA, LLC d/b/a HARTON REGIONAL MEDICAL CENTER, Defendant, No. 40937. May 3, 2016. (Deposition).

IN THE CHANCERY COURT FOR BEDFORD COUNTY, TENNESSEE, GRADY CUNNINGHAM, Plaintiff, v. BEDFORD COUNTY, TENNESSEE; THE BEDFORD COUNTY BOARD OF COMMISSIONERS, and TONY SMITH, JIMMY PATTERSON, ED CASTLEMAN, DENISE GRAHAM, BOBBY FOX, BILLY KING, JR., BOB DAVIS, JANICE BROTHERS, PHILLIP FARRAR, MARK THOMAS, JOE TILLET, JOHN BROWN, LINDA YOCKEY, TONY BARRETT, JEFF YOES, DON GALLAGHER, and JIMMY WOODSON, individually and in their official capacities as members of the Bedford County Board of Commissioners, Defendants, CASE NO. 30129. July 15, 2016. (Deposition).

IN THE CHANCERY COURT FOR BEDFORD COUNTY, TENNESSEE, GRADY CUNNINGHAM, Plaintiff, v. BEDFORD COUNTY, TENNESSEE; THE BEDFORD COUNTY BOARD OF COMMISSIONERS, and TONY SMITH, JIMMY PATTERSON, ED CASTLEMAN, DENISE GRAHAM, BOBBY FOX, BILLY KING, JR., BOB DAVIS, JANICE BROTHERS, PHILLIP FARRAR, MARK THOMAS, JOE TILLET, JOHN BROWN, LINDA YOCKEY, TONY BARRETT, JEFF YOES, DON GALLAGHER, and JIMMY WOODSON, individually and in their official capacities as members of the Bedford County Board of Commissioners, Defendants, CASE NO. 30129. September 1, 2016. (Trial).

IN THE CIRCUIT COURT OF MADISON COUNTY, ALABAMA, JIMMY LARRY BEDDINGFIELD, REBECCA M. BEDDINGFIELD, and JAMES CODY BEDDINGFIELD, Plaintiffs, v. MULLINS INSURANCE COMPANY, MULLINS & COMPANY INSURANCE, RAND MULLINS, Defendants, CV-11-900877. September 15, 2016. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE, ROBIN WILLIAMSON, as mother and next of kin of decedent JOSEPH GARCIA, Plaintiff, v. KEVIN DAVENPORT, NATIONWIDE OTR RECYCLERS, INC., and METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY TENNESSEE, Defendants, Civil Action No. 3:14-CV-2016. November 17, 2016. (Deposition).

IN THE CIRCUIT COURT FOR COFFEE COUNTY, TENNESSEE, SUSAN WALTON, individually and as surviving spouse and next of kin of JAMES WALTON, deceased, Plaintiff, v. TULLAHOMA HMA, LLC d/b/a HARTON REGIONAL MEDICAL CENTER, Defendant, No. 40937. December 7, 2016 (Trial).

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ALABAMA, EASTERN DIVISION, DARRYL E. CROMPTON, Plaintiff, v. TUSKEGEE UNIVERSITY, and MATTHEW JENKINS, D.V.M., Individually, Defendants, 3:14-CV-1189-WHA-CSC. February 2, 2017 (Trial).

IN THE CIRCUIT COURT FOR HAMILTON COUNTY, TENNESSEE, REBECCA L. SIMMONS and DAVID M. SIMMONS, Parents and Next of Kin of SAWYER DAVID SIMMONS, Deceased, Plaintiffs, v. REGIONAL OBSTETRICAL CONSULTANTS, P.C.; GARRETT KA KEUNG LAM, M.D., Defendants. CIVIL ACTION NO. 14C1362. February 21, 2017. (Deposition).

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE AT NASHVILLE, Dianna Nicole Austin, surviving spouse of Shawn Allen Austin, deceased, Plaintiff, v. Dredge One, Inc.; and, John W. McDougall Co., Inc., Defendants, No. 12-C 2620. March 9, 2017. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, COLUMBIA DIVISION, La'Monn Harris, Plaintiff, v. The City of Lewisburg, Tennessee, and Buck Beard, Defendants. May 15, 2017. (Deposition).

IN THE CIRCUIT COURT OF MORGAN COUNTY, ALABAMA, CYNTHIA COLLINS, Plaintiff, v. FAMILY DOLLAR STORES OF ALABAMA, INC., et al., Defendants. Civil Action Number: CV14-900428. May 25, 2017. (Deposition).

IN THE CIRCUIT COURT FOR RUTHERFORD COUNTY, TENNESSEE AT MURFREESBORO, FRED L. KING, Plaintiff, v. CHRISTIAN CARE CENTER OF RUTHERFORD COUNTY, Defendant, CIVIL ACTION NO. 215-CCV. June 24, 2017. (Deposition).

IN THE CIRCUIT COURT FOR RUTHERFORD COUNTY, TENNESSEE AT MURFREESBORO, ROBERT JUNIOR HART, Plaintiff, v. JAMES MARTELL FISH, D.O. and PREMIER ORTHOPAEDICS & SPORTS MEDICINE, PLC, Defendants. Case No. 71553. August 12, 2017. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, COLUMBIA DIVISION, La'Monn Harris, Plaintiff, v. The City of Lewisburg, Tennessee, and Buck Beard, Defendants. August 17, 2017. (Trial).

IN THE CIRCUIT COURT FOR RUTHERFORD COUNTY, TENNESSEE AT MURFREESBORO, MICHELLE EDWINA GALBO, as surviving spouse of SAMUEL JAMES GALBO, deceased, and on behalf of ELLA CLARE GALBO, MIABELLA LANAY GALBO, and ANNABELLA LOUISE GALBO, surviving minor children of SAMUEL JAMES GALBO, deceased, Plaintiff, v. SAINT THOMAS RUTHERFORD HOSPITAL, ASCENSION HEALTH, AND SAINT THOMAS HEALTH, Defendants, No. 69762. September 5, 2017. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA, ATLANTA DIVISION, ERICK BUKE AND MICHA TUVENGANA AS THE PARENTS OF PRECIEUX BUKE BASULAMA, DECEASED MINOR, AND ERICK BUKE AS THE ADMINISTRATOR OF THE ESTATE OF PRECIEUX BUKE BASULAMA, Plaintiffs, v. MILESTONE MANAGEMENT TRS, LLC AND LANDMARK AT BELLA VISTA, L.P., Defendants, Civil Action No. 1:16-CV-03823-LLM. October 26, 2017. (Deposition).

IN THE CIRCUIT COURT FOR COFFEE COUNTY AT MANCHESTER, TENNESSEE, Julee Harris, for herself as spouse and widow of Kenneth C. Harris, deceased, and on behalf of the children and natural heirs at law of Kenneth C. Harris, deceased, Stephanie N. Harris, C.M.H., a minor, and M.D.H., a minor, Plaintiff, v. Coffee Medical Group, LLC d/b/a United Regional Medical Center and Neil E. Christopher, M.D. and Sheryl Dietrich, R.N. and Mallory L. Pesaturo, LPN Defendants, CASE NO. 40,115. November 1, 2017. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE KNOXVILLE DIVISION, JOHN EDWARD ANDERSON III, Plaintiff, v. OAK RIDGE SCHOOLS BOARD OF EDUCATION a/k/a OAK RIDGE CITY BOARD OF EDUCATION and OAK RIDGE SCHOOLS, DR. BRUCE BORCHERS, officially and individually, and DR. CHRIS MARCZAK, officially and individually, Defendants. Case No. 3:16-cv-235. December 5, 2017. (Deposition).

IN THE DISTRICT COURT, 219TH JUDICIAL DISTRICT, COLLIN COUNTY, TEXAS, SANTOS CORTEZ & AZALIA CORTEZ, Plaintiffs, v. POLLOCK INVESTMENTS INCORPORATED and FTW TRANSPORT, LLC, AND GERIN CARRIERS, LLC, Defendants. CAUSE NO.: 219-04337-2016. January 18, 2018. (Deposition).

IN THE WASHINGTON COUNTY CIRCUIT COURT AT JONESBOROUGH, TENNESSEE, JAN SMITH, Plaintiff, v. NATIONAL HEALTHCARE CORPORATION TENNESSEE; NATIONAL HEALTHCARE CORPORATION DELAWARE; NATIONAL HEALTHCARE CORPORATION OF DELAWARE; NATIONAL HEALTHCARE PARTNERS MEDICAL SERVICES

ORGANIZATION, LLC DELAWARE; NATIONAL HEALTHCARE QUALITY REGISTRY TENNESSEE; NATIONAL HEALTHCARE REVIEW, LLC DELAWARE; NATIONAL HEALTH CORPORATION; NHC HEALTHCARE/JOHNSON CITY, LLC all d/b/a NHC JOHNSON CITY, NHC and NATIONAL HEALTHCARE CORPORATION, Defendants. Case No. 34781. March 5, 2018. (Deposition).

IN THE FIFTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, AT NASHVILLE, TRACY PIZZILLO VON TAGEN, Plaintiff, v. CONTINENTAL PROPERTIES COMPANY, INC., SPRINGS AT MOUNTAIN VIEW, CIVIL CONSTRUCTORS, INC., MCSHANE CONSTRUCTION COMPANY, TERRACON, CIVIL SITE DESIGN GROUP, and QORE PROPERTY SCIENCES, Defendants. DOCKET NO. 11C-2589. March 27, 2018. (Deposition).

IN THE SULLIVAN COUNTY LAW COURT AT KINGSFORT, TENNESSEE, CHRIS YOKLEY and DIANA YOKLEY, HUSBAND and WIFE, Plaintiffs, v. MOUNTAIN EMPIRE OIL COMPANY, Defendant, CASE NUMBER: C40558. May 9, 2018. (Deposition).

FIRST JUDICIAL DISTRICT COURT, CADDO PARISH, LOUISIANA, MARK MCLAUGHLIN, Plaintiff, v. JODY HOLLIS AND STATE FARM MUTUAL AUTOMOBILE INURANCE COMPANY, Defendants, PERMANENT ASSIGNMENT SECTION C, NUMBER: 581,417. May 30, 2018. (Deposition).

IN THE CIRCUIT COURT FOR THE STATE OF TENNESSEE, TWENTY-FIRST JUDICIAL DISTRICT, WILLIAMSON COUNTY, SUMMERS PAUL LYLE III and PATRICIA LYLE, Plaintiffs, v. WILLIAM R. MCDANIEL, M.D., Defendant. Case No.: 2017-62. June 21, 2018. (Deposition).

FIRST JUDICIAL DISTRICT COURT, CADDO PARISH, LOUISIANA, MARK MCLAUGHLIN, Plaintiff, v. JODY HOLLIS AND STATE FARM MUTUAL AUTOMOBILE INURANCE COMPANY, Defendants, PERMANENT ASSIGNMENT SECTION C, NUMBER: 581,417. June 28, 2018. (Trial).

IN THE CHANCERY COURT FOR RUTHERFORD COUNTY, TENNESSEE AT MURFREESBORO, GEORGE L. ECKLES, JR., Petitioner, v. MARY ANN ECKLES, Respondent. July 19, 2018. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, JAMES GARRETT, Plaintiff, v. CSX TRANSPORTATION, INC., Defendant. Case No.: 3:17-cv-497. August 3, 2018. (Deposition).

DISTRICT COURT, JEFFERSON COUNTY, COLORADO, JANET TORMA-KRAJEWSKI, Plaintiff, v. COLORADO SCHOOL OF MINES; RAMONA M. GRAVES; PRISCILLA NELSON; JURGEN BRUNE; and TERRY PARKER, Defendants. Case Number: 2016-CV-31341. February 25, 2016. (Deposition).

UNITED STATES DISTRICT COURT, MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, EPAC TECHNOLOGIES, INC., Plaintiff, v. THOMAS NELSON INC., Defendant. Case No: 3-13-cv-384-WMC. September 14, 2018. (Deposition).

IN THE CIRCUIT COURT FOR THE STATE OF TENNESSEE, TWENTY-THIRD JUDICIAL DISTRICT, DICKSON COUNTY, ROBIN LYNN JACKSON, Plaintiff, v. DICKSON EAR, NOSE & THROAT, PLC d/b/a ENT SINUS & ALLERGY CLINIC, and JAMES M. ROTH, M.D., Defendants. No. 22cc-2017-cv-89. January 4, 2019. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE, WESTERN DIVISION, BENJAMIN MILLER and KRISTI ROSE, Plaintiffs, v. TIGER STYLE CORPORATION d/b/a SPEED 1 TRANSPORT, HARMAN DEEP SINGH BRAR & COX TRANSPORTATION SERVICES, INC., Defendants. Docket No. 2:18-cv-02275-SHL. February 1, 2019. (Deposition).

UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF FLORIDA, FORT LAUDERDALE DIVISION, KAREN EVICH and ROBERT EVICH, both individuals, Plaintiff, v. TARGET CORPORATION, a foreign corporation, Defendant. Case No.: 0-18-cv-61062. February 14, 2019. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE KNOXVILLE DIVISION, JOHN EDWARD ANDERSON III, Plaintiff, v. OAK RIDGE SCHOOLS BOARD OF EDUCATION a/k/a OAK RIDGE CITY BOARD OF EDUCATION and OAK RIDGE SCHOOLS, DR. BRUCE BORCHERS, officially and individually, and DR. CHRIS MARCZAK, officially and individually, Defendants. Case No. 3:16-cv-235. March 13, 2019. (Trial).

IN THE CIRCUIT COURT FOR THE STATE OF TENNESSEE, TWENTY-FIRST JUDICIAL DISTRICT, WILLIAMSON COUNTY, SUMMERS PAUL LYLE III and PATRICIA LYLE, Plaintiffs, v. WILLIAM R. MCDANIEL, M.D., Defendant. Case No.: 2017-62. April 2, 2019. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, MISTY D. MCGRADY, Plaintiff, v. JIM MATTIS, Secretary of Defense, in his official capacity; ROBERT M. SPEER, Acting

Secretary of the Army, in his official capacity; JOSEPH L. LENGYEL, Chief, National Guard Bureau, in his official capacity; VICTORIA A. LIPNIC, Acting Chair, EQUAL EMPLOYMENT OPPORTUNITY COMMISSION, in his official capacity; TERRY M HASTON, Adjutant General of the State of Tennessee, in his official capacity, and the UNITED STATES OF AMERICA, Defendants. NO. 3:17-cv-00390. April 23, 2019. (Deposition).

IN THE CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE, STEAD VESTEY, as next of kin of and on behalf of KOREN VESTEY, Deceased, Plaintiff, v. THOMAS BRENLIN TAYLOR, JR., M.D., SKYLINE SURGERY ASSOCIATES, PLC, TRISTAR SKYLINE MEDICAL CENTER, ASSUMED NAME FOR THE HTI MEMORIAL HOSPITAL CORPORATION, KRISTIN ALEXANDRIA GAFFNEY, D.O., AND GASTROENTEROLOGY AND HEPATOLOGY ASSOCIATES, PLLC, Defendants, Case No. 17C963. May 20, 2019. (Trial).

IN THE UNITED STATES DISTRICT COURT FOR TENNESSEE FOR THE MIDDLE DISTRICT NASHVILLE DIVISION, DR. VANESSA GARCIA, Plaintiff, v. THE METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY, TENNESSEE, Defendant. June 18, 2019. (Deposition).

IN THE CIRCUIT COURT FOR WILLIAMSON COUNTY, TENNESSEE, MARTY FITZGERALD and MELISSA FITZGERALD, individually, as husband and wife, and on behalf of their deceased child, MEGAN FITZGERALD, Plaintiff, v. JAMES WOODROW OSBORN and OSBORN ENTERPRISES, INC., II, and OSBORN ENTERPRISES, INC., III, Defendant, NO. 2018-311. August 9, 2019. (Deposition).

IN ARBITRATION, KATHERIN CASEY v. CONCORDE CAREER COLLEGE, AMERICAN ARBITRATION ASSOCIATION CASE NUMBER: 01-18-0002-8695. October 17, 2019. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE, NASHVILLE DIVISION, DOUGLAS BUTTS, Plaintiff, v. T-MOBILE USA, INC., Defendant. October 24, 2019. (Deposition).

IN ARBITRATION, KATHERIN CASEY v. CONCORDE CAREER COLLEGE, AMERICAN ARBITRATION ASSOCIATION CASE NUMBER: 01-18-0002-8695. October 30, 2019. (Trial).

STATE OF MINNESOTA, DISTRICT COURT, COUNTY OF DAKOTA, FIRST JUDICIAL DISTRICT, ROBIN NELSON, Plaintiff, v. SCOTT JOHNSON and JOHNSON DIVERSIFIED PRODUCTS, INC., Defendants. November 1, 2019. (Trial).

IN THE SUPERIOR COURT OF ROCKDALE COUNTY, STATE OF GEORGIA, SAWYER A. STOKES, a Minor, by and through STEPHANIE M. STOKES and LINDEN D. STOKES, Conservators of the Property, and STEPHANIE M. STOKES and LINDEN D. STOKES, individually, Plaintiffs, vs. ROCKDALE HOSPITAL, LLC d/b/a ROCKDALE MEDICAL CENTER, GREYSTONE OB/GYN, LLC, RICHARD M. ROBINSON, and ALECIA T. CASH, Defendants. Civil Action. File Number: 2018-CV-2166. November 26, 2019. (Deposition).

IN THE CIRCUIT COURT OF SULLIVAN COUNTY, TENNESSEE AT KINGSPORT, TRACY MICHAEL, Plaintiff, v. WELLMONT WEXFORD HOUSE f/k/a RHA/SULLIVAN, INC. and WELLMONT HEALTH SYSTEM, d/b/a THE WEXFORD HOUSE, Defendants. No.: C40837(M). December 20, 2019. (Deposition).

UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF ALABAMA, NORTHWESTERN DIVISION, JAMES LESTER MATTHEWS, II, Plaintiff, v. UNITED STATES OF AMERICA, Defendant, Case No.: 3:18-cv-01280-HNJ. January 15, 2020. (Deposition).

IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE, MERRILL BEENE, Plaintiff, v. MATTHEW WHITAKER, ACTING UNITED STATES ATTORNEY GENERAL, Defendant. Case No. 3:18-cv-00693. February 6, 2020. (Deposition).

FIRST JUDICIAL DISTRICT COURT, CADDO PARISH, LOUISIANA, SECTION A, JAMIE CLUTE, ZACHARY CLUTE AND GARRETT CLUTE, Plaintiffs, v. CURTIS L. BRACY, SHREVEPORT TRANSIT MANAGEMENT, INC. d/b/a SPORTRAN, AND AMERICAN ALTERNATIVE INSURANCE CORPORATION, Defendants. NUMBER: 607.956. March 2, 2020. (Deposition).

IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA, DISHANNA GARMON, as Personal Representative of the Estate of ALEXANDER ARMSTRONG, deceased, on behalf of the Estate and its lawful survivor, to wit: A.A., as surviving daughter, Plaintiff, v. SP LINCOLN FIELDS, LP, a Florida Limited Partnership, KCD INVESTMENTS, INC., a Florida Corporation, and MASTER SECURITY COMPANY, LLC, d/b/a MSC SECURITY, LLC, a Foreign Limited Liability Company, Defendants. GENERAL JURISDICTION DIVISION, CASE NO.: 2015-22639 CA 01. March 6, 2020. (Deposition).

COMMUNITY ACTIVITIES

Tennessee State House of Representatives (Representative, 2018-present).

Community Foundation of Rutherford County (Board Member, 2018-present).
Oaklands Historic Mansion Foundation (Board Member, 2015-present).
Linebaugh Library Foundation (Board Member, 2014-present).
Murfreesboro City Schools Foundation (Board Member, 2013-2019).
Rutherford County Commission (Commissioner, 2010-2018).
American Heart Association, Rutherford County (Board Member, 2012-2017).
United Way of Rutherford and Cannon Counties (Board Member, 2013-2017).
Domestic Violence Center, Murfreesboro (Board Member, 2005-2010; Advisory Board Member, 2010-present).
Eagle Scout (September 12, 1988, Great Smokey Mountain Council, Knoxville, TN).

Exhibit B: Case-Related Documents

1. The complaint.
2. Memorandum opinion from Judge Eli Richardson.
3. Partial income tax returns for Dr. Singh for 2011, 2013, and 2014.
4. W-2 form from Vanderbilt for Dr. Singh for 2015 and 2016.
5. W-2 form from BMO Capital Markets Corporation for Dr. Singh for 2017, 2018, and 2019.
6. Excerpts from the deposition of Dr. Justin Sternberg (May 8, 2019).
7. Emails from Dr. Singh (June 4, 2020 and June 6, 2020).

Exhibit C: Treatises and Other Information

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2. American Medical Group Association. (2015). “2015 Medical Group Compensation and Production Survey.” Alexandria, VA: <https://www.amga.org/>.
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5. Becker, Gary. (1975). *Human Capital*. New York, NY: National Bureau of Economic Research.
6. Ben-Porath, Yoram. (1967). “The Production of Human Capital and the Life Cycle of Earnings.” *Journal of Political Economy*, 75 (4): 352-365.
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12. Bureau of Labor Statistics. (2019c). “Employer Costs for Employee Compensation – September 2019.” *Monthly Labor Review*, December 18, 2019: <http://www.bls.gov/news.release/pdf/ecec.pdf>.
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2029.” (August 2019 Update).

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18. *Frye v. Memphis State University*, 806 S.W.2d 170 (Tenn.1991).
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20. *Gunter v. Bemis Co.*, 906 F.3d 484 (6th Cir.2018).
21. *Hamlin v. Charter Tp. of Flint*, 165 F.3d 426 (6th Cir.1999).
22. *Jackson v. City of Cookeville*, 31 F.3d 1354 (6th Cir.1994).
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32. *Rasimas v. Michigan Dept. of Mental Health*, 714 F.2d 614 (6th Cir.1983).
33. *Roush v. KFC Nat’l Mgmt. Co.*, 10 F.3d 392 (6th Cir.1993).
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